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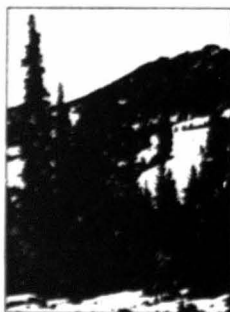
UNITED STATES DEPARTMENT OF THE INTERIOR BUREAU OF LAND MANAGEMENT RAWLINS DISTRICT OFFICE

FEB 2 1988

Adobe Town - Ferris Mountains

WILDERNESS ENVIRONMENTAL IMPACT STATEMENT *final*

ORADUHO



FINAL

ADOBE TOWN — FERRIS MOUNTAIN WILDERNESS ENVIRONMENTAL IMPACT STATEMENT

Rawlins District
Rawlins, Wyoming

Prepared by:
U.S. Department of the Interior
Bureau of Land Management
1987

William A. Oden
Wyoming State Director

12-14-97
Date

SUMMARY

This Environmental Impact Statement (EIS) analyzes the impacts that would result from designating or not designating three wilderness study areas as wilderness. The proposed action recommends a portion of WSAs 030-401/040-408 Adobe Town for wilderness designation (10,920 acres) and a portion for nonwilderness designation (74,790 acres). The proposed action also recommends all of WSA 030-407 Ferris Mountains for wilderness designation (22,245 acres).

Several significant environmental issues were developed during the study process. Issues common to both WSAs include: (1) impacts on wilderness values, (2) impacts on energy and mineral development, (3) impacts on raptors, and (4) impacts on recreational off-road vehicle (ORV) use. Issues specific to the Adobe Town WSA include: (1) impacts on cultural resources, (2) impacts on paleontological resources, (3) impacts on livestock grazing management, and (4) impacts on antelope and mule deer. An issue specific to the Ferris Mountains WSA is impacts on forest management.

The alternatives for each WSA and the significant impacts are summarized below.

ALTERNATIVES AND SIGNIFICANT IMPACTS BY WSA

Adobe Town

Proposed Action (Partial Wilderness/Conflict Resolution)

As stated above, the Proposed Action would recommend 10,920 acres for wilderness designation and 74,790 acres for nonwilderness.

Significant impacts under the Proposed Action relate to the retention of wilderness values and oil and gas production. Wilderness values would be retained on 10,600 acres, including the area which contains the most outstanding wilderness values in the WSA. Wilderness values on 320 acres of the portion recommended for wilderness would be

lost due to natural gas development on pre-FLPMA leases. Approximately 80% of the natural gas underlying the WSA would be recoverable under the Proposed Action.

No Wilderness Alternative

All 85,710 acres of the Adobe Town WSA would be recommended as unsuitable for wilderness designation.

The major impacts under this alternative relate to the loss of wilderness values from oil and gas production. About 85% of the natural gas would be recoverable under the No Wilderness Alternative. However, because of the pattern of oil and gas developments in the WSA, wilderness values on the entire 85,710 acres would essentially be lost.

All Wilderness Alternative

All 85,710 acres of the Adobe Town WSA would be recommended for wilderness designation.

The major impacts under this alternative relate to the retention of wilderness values and oil and gas production. Although the entire WSA would be designated wilderness, valid existing rights on pre-FLPMA oil and gas leases would allow for the recovery of 70% of the WSA's natural gas reserves. However, this means that wilderness values would be lost on 39,300 acres because of the gas development.

Partial Wilderness-2 Alternative

Under the Partial Wilderness-2 Alternative, 16,280 acres would be recommended for wilderness and 69,430 acres would be recommended for nonwilderness.

Impacts under this alternative relate to the retention of wilderness values and oil and gas production. Because of projected developments on existing pre-FLPMA leases in the portion recommended for wilderness, wilderness values would be retained on only 15,000 acres. It is estimated that 72% of the natural gas could be recovered under this alternative.

SUMMARY

Ferris Mountains

Proposed Action (All Wilderness)

Under the Proposed Action, the entire 22,245 acres of the Ferris Mountains WSA would be recommended for wilderness designation.

The major impacts under the Proposed Action relate to the long term retention of wilderness values, the withdrawal of the WSA from mineral exploration, and the effects on timber management.

Wilderness values would be retained on the entire WSA. Because the entire WSA would be designated wilderness, all of its 22,245 acres would be withdrawn from mineral entry. This would not be a significant impact because of the WSA's low mineral potential. Timber harvest of 8 MMBF over the next 50 to 100 years would also be forgone, but no sales are planned in the short term.

No Wilderness Alternative

All 22,245 acres of the Ferris Mountains WSA would be recommended for nonwilderness uses under this alternative.

Here, impacts relate to the long-term loss of wilderness values, the availability of the WSA for mineral exploration and the availability of timber for

harvest. Wilderness values would not receive the legislative protection given to designated wilderness. Because of projected timber harvesting and mineral exploration activities, naturalness would be permanently lost on 4,000 acres. The entire 22,245 acres would be open to mineral entry and leasing, but projections indicate that very little activity would occur. About 8 MMBF of commercial timber (primarily lodgepole pine for posts and poles) would be available for harvest over the next 50 to 100 years. No harvests are currently planned in the WSA.

Enhanced Wilderness Alternative

Under this alternative, the entire Ferris Mountains WSA (22,245 acres) plus state and private inholding (1,800 acres) would be recommended for wilderness. The state and private lands would become part of the designated wilderness upon consummation of a land exchange.

Impacts under this alternative are very similar to those in the Proposed Action (All Wilderness). Differences lie in the increased acreage upon which wilderness values would be retained (an additional 1,800 acres), and the increased acreage withdrawn from mineral entry and leasing. The state and private lands hold no more potential for valuable mineral deposits than the rest of the WSA, so this would not be a significant impact.

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CHAPTER 1

INTRODUCTION AND PLANNING PROCESS

PURPOSE AND NEED

The Federal Land Policy and Management Act of 1976 (FLPMA) mandates Bureau of Land Management (BLM) to manage the public lands and their resources under the principles of multiple use and sustained yield. Wilderness values are identified as part of the spectrum of multiple land-use values to be considered in BLM inventory, planning, and management. Section 603 of FLPMA requires a wilderness review of BLM roadless areas of 5,000 or more acres and roadless islands. The BLM inventory process identified wilderness study areas which have the mandatory wilderness characteristics (size, naturalness, solitude, and/or primitive recreation opportunities). Suitable or unsuitable wilderness recommendations for each WSA will be presented to the President by the Secretary of the Interior. The President will then make recommendations to the Congress. Areas can be designated wilderness only by an act of the Congress. If designated as wilderness, an area would be managed in accordance with the Wilderness Act of 1964.

This document discusses the environmental impacts of either designating or not designating 107,955 acres in three wilderness study areas (WSAs) as wilderness. The WSAs include Ferris Mountains (WSA WY-030-407, 22,245 acres) and Adobe Town (WSAs WY-030-401 and WY-040-408, 85,710 acres). Although Adobe

Town actually consists of two WSAs, (one in the Rock Springs District and one in the Rawlins District), they are contiguous areas; in this EIS both will be referred to as Adobe Town WSA and analyzed as a single unit.

The purpose of the proposed action is to manage 22,245 acres of the Ferris Mountains WSA and 10,920 acres of the Adobe Town WSA as wilderness. The remainder of the Adobe Town WSA (74,790 acres) would be managed for uses other than wilderness.

The WSAs being studied are covered by two management framework plans (MFPs); these are the Divide Resource Area MFP and the Salt Wells Resource Area MFP. The WSAs are listed in Table 1.

TABLE 1

LIST OF WILDERNESS STUDY AREAS

Name	Number	Acres	MFP
Adobe Town	WY-030-401 WY-040-408 (combined)	85,710	Divide Salt Wells
Ferris Mountains	WY-030-407	22,245	Divide

LOCATION

The WSAs are located in southcentral Wyoming, near Rawlins, Wyoming (see map 1). Adobe Town WSA is 80 miles southwest of Rawlins and Ferris Mountains WSA is 45 miles north of Rawlins.

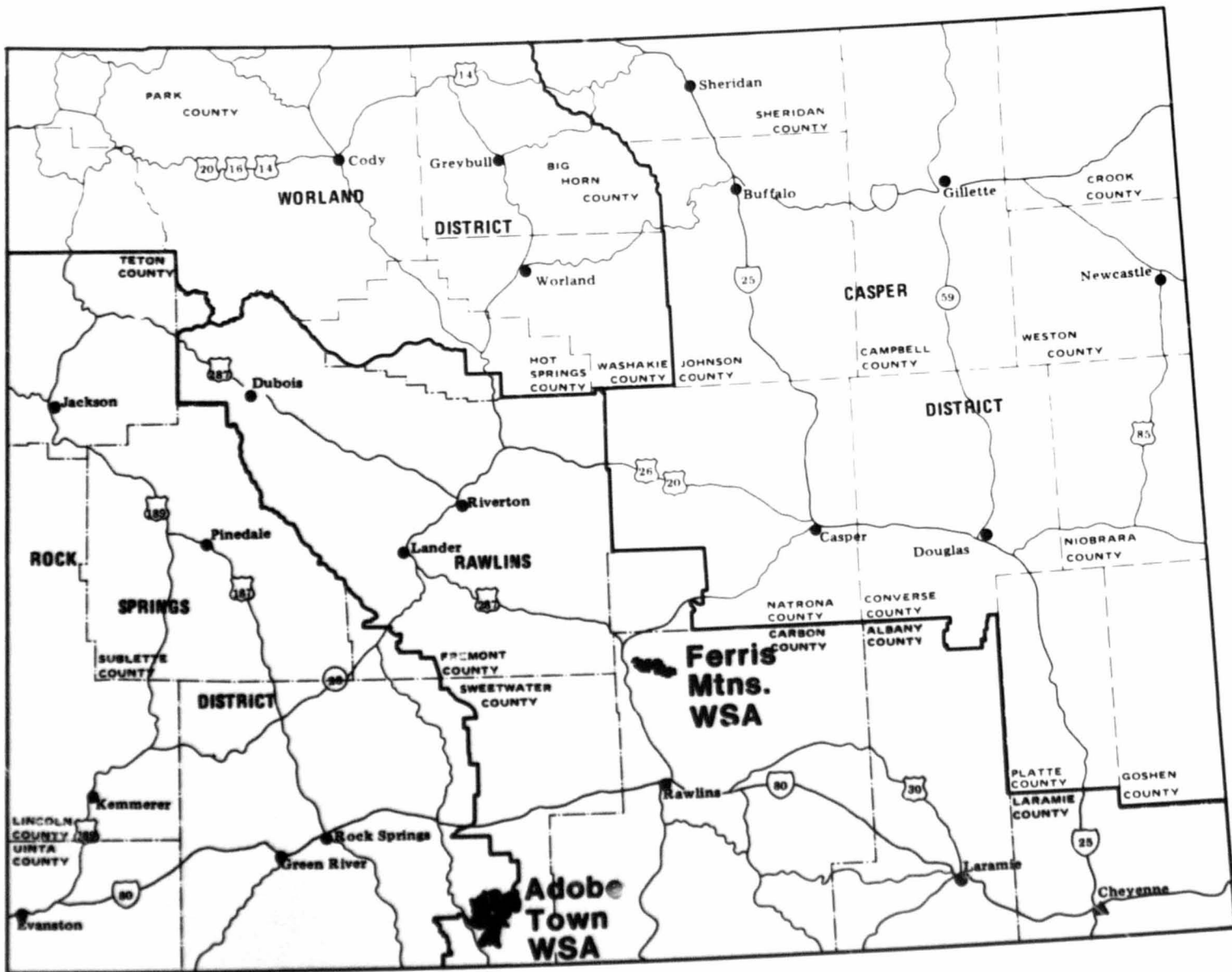
ENVIRONMENTAL ISSUE IDENTIFICATION/SCOPING

The scoping process for the Adobe Town/Ferris Mountains Wilderness Environmental Impact Statement (EIS) encompasses issues identified by the BLM staff, the public, and government agencies at all levels. Scoping occurred throughout the development of the Divide and Salt Wells MFPs; numerous meetings were held with individuals, interest groups, industry representatives, and government agencies.

The draft Adobe Town/Ferris Mountains Wilderness EIS was released for public review and comment in June 1983. The formal comment period was open until the end of September 1983. A public hearing was held July 26, 1983 at Rawlins, Wyoming.

During the scoping process, consultation continues with the Wyoming State Historic Preservation Officer (SHPO) concerning the presence or absence of sites in the WSA that would be eligible for nomination for listing on the "National Regis-

WYOMING



--- COUNTY BOUNDARIES

— DISTRICT BOUNDARIES

Map 1
Adobe Town - Ferris Mountains WSA
LOCATION MAP

INTRODUCTION AND PLANNING PROCESS

ter of Historic Places." Consultation with the U.S. Fish and Wildlife Service concerning threatened or endangered species has occurred. The environmental issues selected for analysis in this EIS follow.

Impacts on Wilderness Values

The wilderness values of naturalness, solitude, and primitive recreation could benefit from wilderness designation. The same values may be adversely affected by uses and actions that would occur should the WSAs not be designated wilderness. The degree to which these values would or would not be preserved is an issue for analysis in the EIS.

Impacts on the Development of Energy and Mineral Resources

Wilderness designation could affect the ability to explore for and develop mineral resources by withdrawing designated lands from mineral entry. For the Adobe Town WSA, the issue relates to the production of natural gas. For the Ferris Mountains, the issue relates to exploration and development of locatable minerals. The effect of wilderness designation on the development of these mineral resources is an issue for analysis in the EIS.

Impacts on Recreation and Off-Road Vehicle Use

Wilderness designation would eliminate the use of recreational off-road vehicles (ORVs) in the WSAs. Eliminating this use could affect the availability of opportunities for ORV recreation and shift ORV uses currently occurring in the WSAs to adjacent lands. Elimination of ORVs might also help preserve opportunities for nonmotorized forms of recreation. The impact of wilderness designation on recreation and ORV use in the vicinity of the WSAs is an issue for analysis of this EIS.

Impacts on Livestock Management in Adobe Town WSA

Wilderness designation would eliminate the use of vehicles to monitor domestic sheep while they are on their winter range within the Adobe Town

WSA. The effect of wilderness designation on vehicle use for livestock management in this WSA is an issue for analysis.

Impacts on Cultural Resources in Adobe Town WSA

Prior to oil and gas development, BLM requires that cultural resource properties be identified and impacts to important properties be mitigated before authorization is given. If oil and gas development occurred in the Adobe Town WSA, a significant amount of information on the WSA's cultural resources would be obtained. Thus, knowledge about the WSA's cultural resources could be enhanced by oil and gas development. On the other hand, wilderness designation could prevent activities that contribute to undocumented loss and destruction of cultural resource sites. The sites would be preserved for future scientific study and recordation. Therefore, the impacts of wilderness designation or nondesignation on cultural resources in the Adobe Town WSA is an issue for analysis in this EIS.

Impacts on Timber Management in the Ferris Mountains WSA

There is approximately 8 million board feet (MMBF) of commercial timber available for harvest in the Ferris Mountains WSA. Wilderness designation could preclude such timber management practices in the WSA. Thus, impacts of wilderness designation on timber management in the Ferris Mountains WSA is an issue for analysis in the EIS.

Impacts on Paleontological Resources in Adobe Town WSA

Adobe Town WSA contains a multitude of paleontological resources, some extremely rare. If oil and gas development occurred in the Adobe Town WSA, a significant amount of information could be obtained about the WSA's paleontological resources. However, wilderness designation could prevent activities that contribute to undocumented loss and destruction of paleontological resources. Therefore, the impacts of wilderness designation or nondesignation on paleontological resources in the Adobe town WSA is an issue for analysis in this EIS.

INTRODUCTION AND PLANNING PROCESS

Impacts on Antelope and Mule Deer in Adobe Town WSA

There are approximately 750 antelope and 225 mule deer utilizing the Adobe Town WSA during the winter. Natural gas development activities could be disruptive to these populations, possibly reducing herd numbers. Therefore, the impact of natural gas development on antelope and mule deer populations is an issue for analysis in the EIS.

Impacts on Elk and Bighorn Sheep in the Ferris Mountains WSA

Elk and bighorn sheep habitat in the Ferris Mountains WSA includes some commercial forest land. Concern was expressed that if timber harvest occurred, habitat could be adversely affected. Thus, the impact of timber harvest on elk and bighorn sheep is an issue for analysis in the EIS.

Impacts on Raptors

Raptor nest reproduction rates are dependent, in part, on the level of human activity in the vicinity of the nests. Development activities such as natural gas development, timber harvesting, and associated roads can decrease nest success rates. Wilderness could prohibit those activities, thus maintaining nesting habitat. Therefore, the impacts of wilderness designation or nondesignation on raptor nesting in both WSAs is an issue for analysis in this EIS.

The following issues were identified in scoping, but were not selected for detailed analysis in the EIS. The reasons for setting the issues aside are discussed below.

Impacts on Livestock Operations in the Ferris Mountains WSA

Concerns were raised that livestock operators in the Ferris Mountains WSA could be required to modify their operations within designated wilderness in a manner that would have significant adverse economic impact on their business. This issue was considered but dropped because the BLM's Wilderness Management Policy provides for the continued use of wilderness areas for livestock operations at historic levels. Although the management practices of livestock operators in the WSAs would be more closely regulated, they

would continue as they did prior to wilderness designations subject to reasonable regulations. Therefore, this issue was dropped from further analysis. However, because livestock grazing is a major activity in the Ferris Mountains WSA, livestock management will be described for each alternative in chapter 2 and again in chapter 3 (Affected Environment).

Impacts on Wilderness Values Caused by Official Designation and Overuse

Concerns were raised by several individuals that official designation of the WSAs as wilderness would "red-flag" the areas and cause recreational overuse; thus, destroying the values for which the areas were designated. However, this contention is not supported in research analyzing the so-called "designation phenomenon." In several studies, the apparent increase in use is the result of better knowledge of an area by land managing agencies and what occurs therein rather than an actual increase in use. Therefore, this issue was dropped from further analysis.

Impacts on Water Quality

Concerns were raised regarding how water quality would be affected by wilderness designation or nondesignation. For Adobe Town, the concern centers on the potential gas field development. Here, however, surface water will be protected because of well casing design, and produced down-hole water will either be reinjected into a similar geologic formation or evaporated in surface reservoirs. In the Ferris Mountains WSA, the primary influence on water quality is livestock use and this will not vary significantly with either designation or nondesignation. Also, potential effects on water quality from timber harvests will be avoided by standard mitigation procedures such as avoiding steep terrain and using setbacks from live water. Therefore, this issue was dropped from further consideration in this EIS.

Impacts on Threatened or Endangered Species

Although the U.S. Fish and Wildlife Service lists the bald eagle, peregrine falcon, and black-footed ferret as possibly occurring within the WSAs, only one documented bald eagle sighting has occurred. No bald eagle nests, roosts, or wintering areas have been found in either WSA. Pere-

INTRODUCTION AND PLANNING PROCESS

grine falcon habitat is limited in the Adobe Town WSA, and while the falcons have been sighted in the vicinity of the Ferris Mountains WSA, a survey in 1982 failed to discover any peregrine areas or roosts. The Ferris Mountains WSA contains potential peregrine falcon habitat, but it would be unaffected by any of the projected activities in this WSA. Adobe Town WSA does contain some prairie dog towns (the black-footed ferrets main food source) but no ferrets have been sighted. There are no known prairie dog towns in the Ferris Mountains, so there is little likelihood of black-footed ferrets inhabiting the WSA. The U.S. Fish and Wildlife Service concurs that there would be no effect on threatened or endangered species (see Letter No. 2b). Therefore, this issue was dropped from further analysis.

Impacts on Cultural Resources in the Ferris Mountains WSA

Consultation with the State Historic Preservation Officer during scoping and review of existing inventory information indicated that the Ferris Mountains WSA does not contain any cultural resource sites eligible for listing on the National Register of Historic Places. The cultural resource sites that do exist consist of lithic scatters, hearths, and firepits which would be protected under current law with or without wilderness designation. Because the significance of the cultural resource sites in the WSA is low, and because developments even under the No Wilderness Alternative would not cause significant impacts to the sites, this issue was dropped from further analysis.

Impacts on Locatable Minerals in Adobe Town WSA

The Adobe Town WSA has been withdrawn from locatable mineral entry since the 1930s. As a result, there are no mining claims in the WSA and none are expected as long as the withdrawal stays in effect. Therefore, the issue of impacts of wilderness designation on the development of locatable mineral resources was considered but dropped from further analysis. The withdrawal is discussed further in chapter 3.

Impacts on Oil and Gas Development in Ferris Mountains WSA

The issue of impacts of wilderness designation on the development of oil and gas resources in the Ferris Mountains WSA was considered but dropped from further analysis. The oil and gas potential in the WSA is quite low, so no development is expected and the issue was dropped from further consideration. The oil and gas potential for the Ferris Mountains WSA is discussed further in chapter 3.

DEVELOPMENT OF ALTERNATIVES

A series of alternatives ranging from All Wilderness to No Wilderness was developed to analyze each WSA. The All Wilderness and No Wilderness alternatives are required by the National Environmental Policy Act (NEPA). For the purpose of this document, the No Wilderness and the No Action/Continuation of Present Management are considered identical.

For the Adobe Town WSA, the Proposed Action is Partial Wilderness/Conflict Resolution in which 10,920 acres are recommended for wilderness designation. The alternative was developed in response to public comment and changes in oil and gas lease status. It was designed so that the wilderness boundary would better encompass those areas with high wilderness values such as Skull Creek Rim while also considering manageability and the presence of pre-FLPMA oil and gas leases. This alternative represents a modification of the draft EIS's partial wilderness alternative (now titled Partial Wilderness-2 in the final EIS). Alternatives include: (a) No Wilderness/Intensive Management for Oil and Gas; (b) All wilderness; and (c) Partial Wilderness-2.

The Proposed Action for the Ferris Mountains WSA is All Wilderness. Here alternatives include: (a) No Wilderness/No Action and (b) Enhanced Wilderness Management.

INTRODUCTION AND PLANNING PROCESS

ALTERNATIVES CONSIDERED BUT DROPPED FROM ANALYSIS

In the draft EIS, one alternative for Adobe Town was a No Wilderness/No Action Alternative. However, after further analysis it was determined that the actions and impacts of this alternative were essentially identical to the No Wilderness/Intensive Management Alternative. Thus, these were combined into a No Wilderness Alternative in the EIS.

A number of commenters suggested designation of more acreage than that included in the 16,280 acres identified in the Partial Wilderness-2 Alternative. As a result of these comments, several partial wilderness possibilities were examined specifically for preservation of outstanding wilderness values, while considering pre- and post-FLPMA oil and gas leases and manageability. Through this examination, it was found that larger partial wilderness alternatives would either increase the conflicts with oil and gas development on pre-FLPMA leases in areas of high wilderness values, or would add areas of low wilderness values on post-FLPMA leases. In this last situation, the added area would be withdrawn from mineral entry, but the conflict between wilderness designation and gas production would remain. The

former would result in a wilderness with extensive oil and gas activity that would be unmanageable as wilderness. Thus, a larger partial wilderness alternative was considered but dropped from further consideration as being unmanageable. It should be noted that this reexamination resulted in a modification of the original partial wilderness alternative to what is now the Proposed Action.

A partial wilderness alternative for the Ferris Mountains WSA that would recommend for wilderness something less than the entire acreage of the WSA was considered but dropped. In all cases, reducing the acreage would result in an arbitrary boundary and would eliminate important wilderness attributes. Furthermore, adjusted boundaries would not reduce resource conflicts or enhance wilderness values.

Another alternative suggested for the Ferris Mountains was that of "Non-Wilderness/Manage for Primitive Values." This alternative was analyzed in the draft EIS and was found to have identical impacts on the Proposed Action (All Wilderness). As noted previously, there is no inherent increase in visitation due to wilderness designation which was the basic contention behind this alternative. This alternative would create a de facto wilderness. Because the All Wilderness Alternative fully analyzes the effects of designating the WSA as wilderness, the "de facto" alternative was eliminated from the final EIS.

CHAPTER 2

PROPOSED ACTION AND ALTERNATIVES

Since the pattern of future actions cannot be predicted with certainty, assumptions must be made to allow impact analysis to be performed. These assumptions are the basis of the scenarios developed in this impact statement. They are not management plans or proposals, but are believed to represent reasonable patterns of activities which could occur as a result of this action.

ADOBE TOWN

Proposed Action (Partial Wilderness/Conflict Resolution)

Under the Proposed Action, 10,920 acres of Adobe Town WSA, centered around Skull Creek Rim, would be recommended for wilderness designation (see map 2). The remaining 74,790 acres would be available for other multiple-use management and development.

Energy and Minerals Actions

Under the Proposed Action, energy and minerals activities would occur on the 74,790 acres outside of the partial wilderness boundary. Oil and gas development would occur on a 320-acre spacing, in essence two wells every square mile in those areas where terrain and drainages allow. Development would be allowed in accordance with Stipulation No. 1 of the Standard Surface Protection Requirements (see Appendix). No wells would be allowed on post-FLPMA leases in areas exceeding 25% slope or within 500 feet of surface water or riparian areas, except when an approved plan of operations shows that development could occur without significant impacts to other resource values. It is assumed that no development would occur on pre-FLPMA leases in areas of excess slope or near drainages simply from the impracticality of doing so. Thus, there would be 203 wells drilled in the nonwilderness portion, requiring 490 miles of road and 510 miles of pipeline. There would be 8,500 acres of surface disturbance.

There are 4,080 acres of pre-FLPMA leases in the 10,920-acre portion recommended for wilderness.

ness under the Proposed Action. While most of the pre-FLPMA leases are impractical to develop, two wells would be located within the partial wilderness boundary in the northwestern part of the partial wilderness. This would require 2 miles of new road and 2 miles of pipeline, resulting in 84 acres of surface disturbance.

The entire area has been withdrawn from locatable mineral entry since the 1930s. Thus, there are no mining claims in the area and no development would occur.

Livestock and Range Actions

The WSA (85,710 acres) would continue to provide 5,068 AUMs for livestock use. This includes 4,068 AUMs allocated as winter range for domestic sheep. No new range improvements are scheduled for the WSA. Projections beyond existing planning estimates (beyond the 15 to 20 year planning cycle) indicate that it is reasonable to expect that 5,068 AUMs would be maintained in the future.

The use of motorized vehicles would continue for the purposes of monitoring and moving livestock, especially during the winter months, in the nonwilderness portion of the WSA. Motorized vehicles would not be allowed in the portion recommended for wilderness, but vehicles are not typically used therein for management of livestock.

Recreation Management Actions

Under the Proposed Action, ORV use on 74,790 acres of the WSA would be limited to designated roads and trails including the 490 miles of oil and gas related roads, while in the partial wilderness area (10,920 acres) ORVs would be eliminated. While new roads associated with natural gas development would increase the accessibility of most of the WSA, it is not expected to increase use substantially due to the area's isolation. Recreational ORV use is projected to remain below 175 visitor days annually for the next 5 to 10 years; projections beyond this timeframe indicate that it is reasonable to expect recreational ORV use to increase slightly, but remain below 300 visitor days annually.

PROPOSED ACTION AND ALTERNATIVES

The entire WSA would be open for other recreation activities including hunting, horseback riding (generally associated with hunting activities), camping (generally associated with hunting activities), photography, and sightseeing. No recreation facilities or developed trails exist in the WSA and none are planned. Recreational use for these activities would remain below 900 visitor days for the next 10 years. Projections beyond existing planning estimates (beyond the 15 to 20 year planning cycle) indicate that it is reasonable to expect that recreational use for these activities would increase slightly, but remain below 1,000 visitor days annually for the foreseeable future.

Cultural Resource Management Actions

Cultural resource investigations (inventory and evaluation of sites) would occur in conjunction with natural gas development activities. Overall, cultural resource investigations would occur on 8,500 acres corresponding to the amount of surface disturbance caused by natural gas development activities. Outside of these areas, management of cultural resources would be custodial only; no specific management actions are planned.

Wildlife Management Actions

Wildlife Stipulations 2a. and 2b. (see Appendix) would be applied to protect big game winter habitat and raptor nesting habitat. No other wildlife management actions are planned for the Adobe Town WSA.

Paleontological Resource Management Actions

Paleontological investigations (inventory and evaluation of sites) would occur in conjunction with natural gas development activities. Investigations would occur on 8,500 acres corresponding to the amount of surface disturbance caused by natural gas development activities. Outside of these areas, management of paleontological resources would be custodial only; no specific management actions are planned.

No Wilderness/Intensive Management Alternative

All 85,710 acres of this WSA would be recommended for nonwilderness uses. The land would

be open for multiple-use management and development.

Energy and Minerals Actions

Under this alternative, the WSA would be available for oil and gas development. No activity would occur in areas exceeding 25% slopes or within 500 feet of surface water or riparian areas, except where an approved plan of development shows that development could occur without significant impacts to other resource values (see Appendix, Standard Surface Protection Requirements, Stipulation No. 1). There would be an estimated 216 wells with a spacing of 320 acres requiring 520 miles of road and 540 miles of pipeline. The result would be a total of 9,075 acres of surface disturbance due to oil and gas development. The entire area has been withdrawn from locatable mineral entry since the 1930s. There are no mining claims in the area. No development would occur.

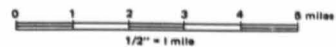
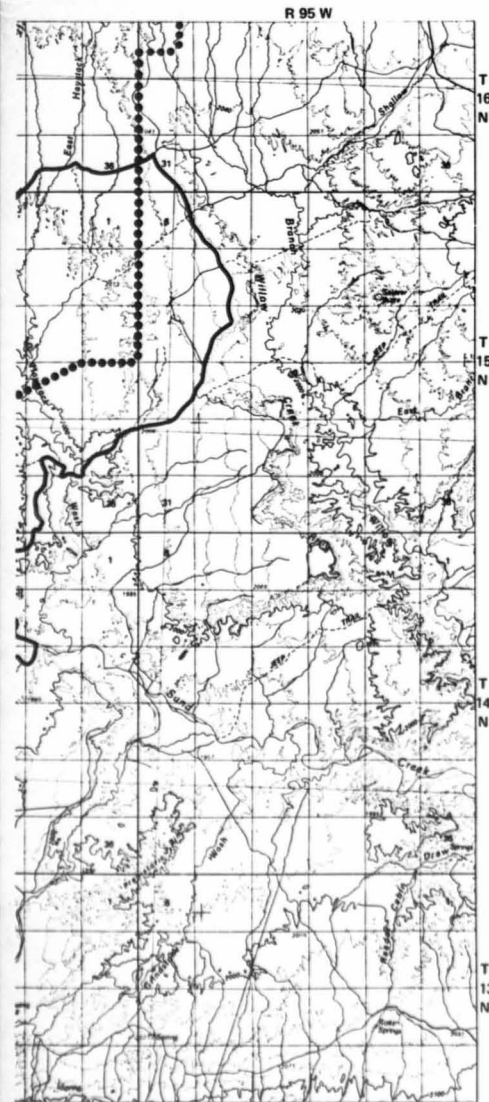
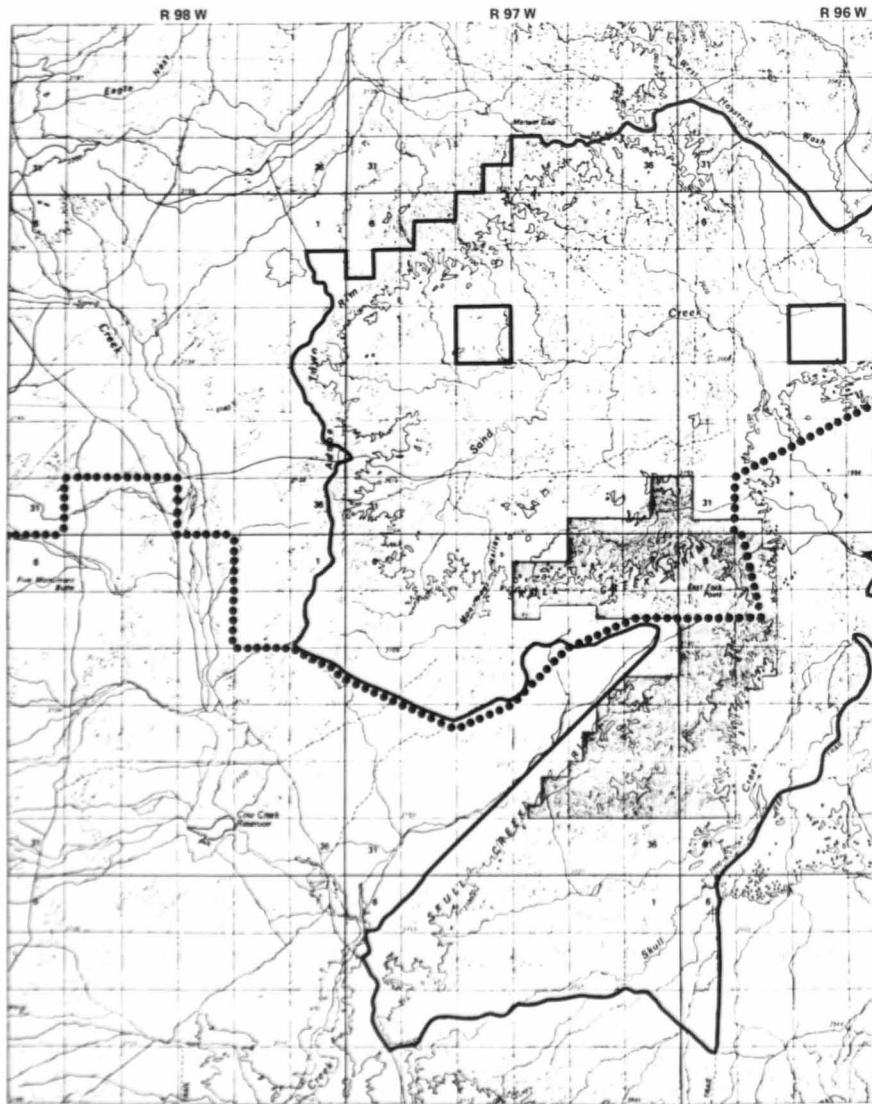
Livestock and Range Actions

Other than the use of motorized vehicles, actions under this alternative would be the same as the Proposed Action. The WSA would continue to provide 5,068 AUMs for livestock use. Motorized vehicles would continue to be used for livestock management in the entire WSA.

Recreation Management Actions

Under the No Wilderness Alternative, all 85,710 acres of the WSA would have ORVs limited to 520 miles of designated roads and trails. Recreational ORV use is projected to remain below 200 visitor days annually for the next 5 to 10 years. Beyond this timeframe, it is reasonable to expect recreational ORV use to increase slightly but remain below 300 visitor days annually for the foreseeable future.

The entire WSA would be open for other recreation activities including hunting, horseback riding (generally associated with hunting activities), camping (generally associated with hunting activities), photography, and sightseeing. No recreation facilities or developed trails exist in the WSA and none are planned. Recreational use for these activities would remain below 900 visitor days for the next 10 years. Projections beyond existing planning estimates (beyond the 15 to 20 year planning cycle) indicate that it is reasonable to expect that recreational use for these activities would increase slightly, but remain below 1,000 visitor days annually for the foreseeable future.



Map 2
 Adobe Town WSA
PROPOSED ACTION
**(PARTIAL WILDERNESS/
 CONFLICT RESOLUTION)**



PROPOSED ACTION AND ALTERNATIVES

Cultural Resource Management Actions

Management actions for cultural resources would be similar to those described in the Proposed Action, except that investigations would be done on 9,075 acres corresponding to the amount of surface disturbance caused by natural gas development. Management for the remainder of the WSA would be custodial only.

Wildlife Management Actions

Wildlife Stipulations 2a. and 2b. would be applied to protect big game winter habitat and raptor nesting habitat (see Appendix). No other wildlife management actions are planned for the Adobe Town WSA.

Paleontological Resource Management Actions

Management actions for paleontological resources would be similar to those described in the Proposed Action, except that investigations would be done on 9,075 acres corresponding to the amount of surface disturbance caused by natural gas development. Management for the remainder of the WSA would be custodial only.

Partial Wilderness-2

Under this alternative, 16,280 acres of the Adobe Town WSA would be recommended for wilderness, while the remaining 69,430 acres would be open for multiple-use management and development (see map 3). This is the original Partial Wilderness Alternative from the draft EIS; the reader is cautioned to not confuse this alternative with the Proposed Action.

Energy and Minerals Actions

Here, 69,430 acres outside of the partial wilderness boundary would be open for oil and gas development, as well as 1,280 acres of pre-FLPMA leases within the partial wilderness boundary. Development would follow Stipulation No. 1 of the Standard Surface Protection Requirements (see Appendix). In these areas, development would be limited to those areas not exceeding 25% slope or within 500 feet of surface water and riparian areas, except where an approved plan of development shows that development could occur without significant impacts to other resource values. Under this alternative, there would be 183 wells in the nonwilderness portion

with 440 miles of road and 460 miles of pipeline, resulting in 7,700 acres of surface disturbance. On the pre-FLPMA leases in the partial wilderness boundary, there would be four wells, 10 miles of road and 10 miles of pipeline, resulting in 170 acres of surface disturbance. Total surface disturbance for this alternative is 7,870 acres. The entire area has been withdrawn from locatable mineral entry since the 1930s. There are no mining claims in the area. No development would occur.

Livestock and Range Actions

Actions under this alternative would be similar to the Proposed Action. The WSA would continue to provide 5,068 AUMs for livestock use. Motorized vehicles would be used for livestock management in the nonwilderness portion (69,430 acres), but could not be used in the portion recommended for wilderness (16,280 acres).

Recreation Management Actions

Under this alternative, ORV use on 69,430 acres would be limited to the 440 miles of designated roads and trails and eliminated on 16,280 acres, except as allowed to access pre-FLPMA leases. Recreational ORV use is projected to remain below 150 visitor days annually for the next 5 to 10 years. The 10 miles of road constructed to access the pre-FLPMA leases in the wilderness portion would be restricted to well operators and BLM inspectors only. Over the long term, recreational ORV use in the nonwilderness portion is expected to increase slightly but remain below 250 visitor days annually for the foreseeable future.

The entire WSA would be open for other recreation activities including hunting, horseback riding (generally associated with hunting activities), camping (generally associated with hunting activities), photography, and sightseeing. No recreation facilities or developed trails exist in the WSA and none are planned. Recreational use for these activities would remain below 900 visitor days for the next 10 years. Projections beyond existing planning estimates (beyond the 15 to 20 year planning cycle) indicate that it is reasonable to expect that recreational use for these activities would increase slightly, but remain below 1,000 visitor days annually for the foreseeable future.

Cultural Resource Management Actions

Management actions for cultural resources would be similar to those described in the Pro-

PROPOSED ACTION AND ALTERNATIVES

posed Action, except that investigations would be done on 7,770 acres associated with surface disturbance caused by natural gas development. Management of cultural resources for the remainder of the area would be custodial only.

Wildlife Management Actions

Wildlife Stipulations 2a. and 2b. would be applied to protect big game winter habitat and raptor nesting habitat (see Appendix). No other wildlife management actions are planned for the Adobe Town WSA.

Paleontological Resource Management Actions

Management actions for paleontological resources would be similar to those described in the Proposed Action, except that investigations would be done on 7,700 acres associated with surface disturbance caused by natural gas development. Management of paleontological resources for the remainder of the WSA would be custodial only.

All Wilderness Alternative

Under this alternative, the entire 85,710 acres of Adobe Town would be recommended for wilderness designation.

Energy and Minerals Actions

Under an All Wilderness Alternative, oil and gas development would occur only on pre-FLPMA leases. Because of the impracticality of doing otherwise, development would occur only in areas which do not exceed 25% slope or are within 500 feet of major drainages (see Appendix, Standard Surface Protection Requirements). There are 39,300 acres of pre-FLPMA leases (1987 figures) within the Adobe Town WSA and assuming a 320-acre spacing, there would be about 89 wells drilled with 215 miles of new road and 225 miles of pipeline. Total surface disturbance would be 3,750 acres. The entire area has been withdrawn from locatable mineral entry since the 1930s. There are no mining claims in the area. No development would occur.

Livestock and Range Actions

The WSA would continue to provide 5,068 AUMs of forage for livestock. The use of motor-

ized vehicles to manage livestock would be eliminated.

Recreation Management Actions

Under an All Wilderness Alternative, ORVs would be eliminated from the entire 85,710 acres of the WSA. Only authorized vehicles (well operators and BLM inspectors) would still be allowed on 39,300 acres corresponding to the pre-FLPMA leases.

The entire WSA would be open for nonmotorized recreation activities including hunting, horseback riding (generally associated with hunting activities), camping (generally associated with hunting activities), photography, and sightseeing. No recreation facilities or developed trails exist in the WSA and none are planned. Recreational use for these activities would remain below 900 visitor days for the next 10 years. Projections beyond existing planning estimates (beyond the 15 to 20 year planning cycle) indicate that it is reasonable to expect that recreational use for these activities would increase slightly, but remain below 1,000 visitor days annually for the foreseeable future.

Cultural Resource Management Actions

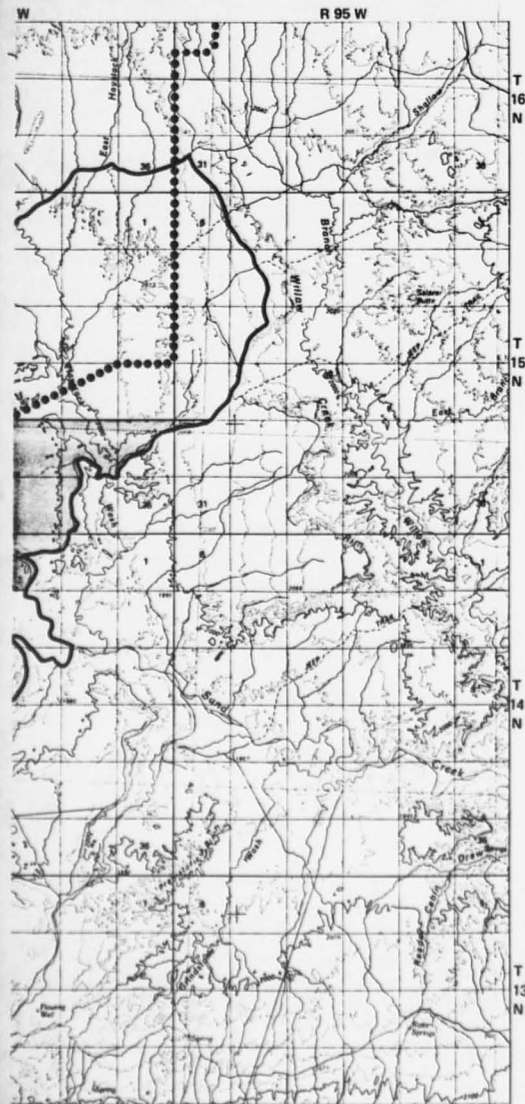
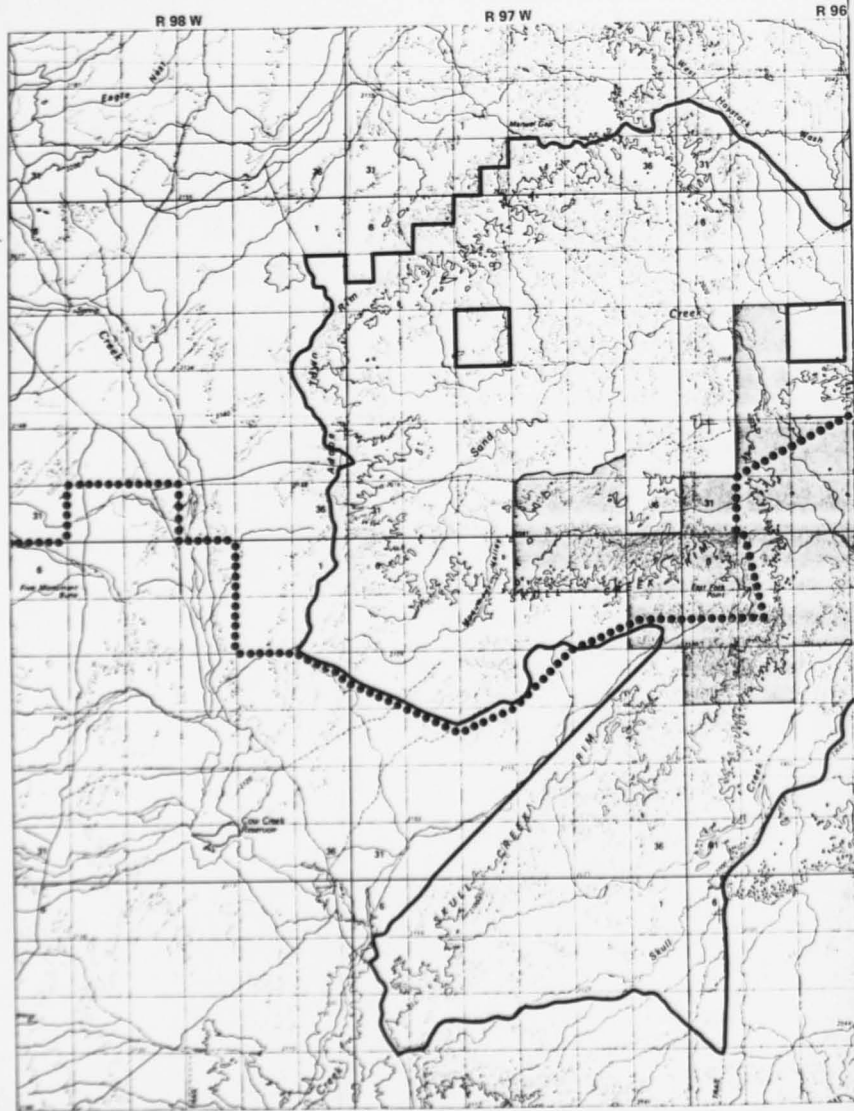
Management actions for cultural resources would be similar to those described in the Proposed Action, except that investigations would be done on 3,750 acres associated with surface disturbance caused by natural gas development activities. Management of cultural resources for the remainder of the WSA would be custodial only.




Wildlife Management Actions

Wildlife Stipulations 2a. and 2b. would be applied to protect big game winter habitat and raptor nesting habitat (see Appendix). No other wildlife management actions are planned for the Adobe Town WSA.

Paleontological Resource Management Actions

Management actions for paleontological resources would be similar to those described in the Proposed Action, except that clearances would be done on 3,750 acres associated with surface disturbance caused by natural gas develop-



-  Partial Wilderness Alternative
-  Rawlins-Rock Springs District Boundary
-  Wilderness Study Area Boundary

0 1 2 3 4 5 miles
1/2" = 1 mile

Map 3
Adobe Town WSA
PARTIAL WILDERNESS - 2

NOTE: Elevations shown in meters
above sea level.
Contour interval 20 meters

PROPOSED ACTION AND ALTERNATIVES

ment. Management of paleontological resources in the remainder of the WSA would be custodial only.

FERRIS MOUNTAINS

Proposed Action (All Wilderness)

Under the Proposed Action, all the Ferris Mountains WSA (22,245 acres) would be recommended for wilderness (see map 4).

Energy and Minerals Actions

Under the Proposed Action, the entire WSA would be withdrawn from oil and gas leasing. There are no pre-FLPMA leases in the WSA and there is low potential for oil and gas in the WSA.

There are four existing lode mining claims located on the extreme east side of the WSA. The BLM's Wilderness Management Policy states that prior to commencing operations, a formal validity examination must occur to determine whether or not the claims in question indeed hold sufficient quantity and quality of material so that a prudent man could expect to get a reasonable return on his investment. For purposes of analysis, it is assumed that such an examination would show insufficient quantity and quality of material to satisfy the prudent man concept. Thus, the claims would be deemed null and void and no mining development would be allowed. The entire 22,245 acres would be withdrawn from all forms of appropriation under the mining laws upon designation by Congress.

Recreation Management Actions

The entire 22,245 acres of the WSA would be closed to ORV use. The WSA would be open for other recreation activities including hunting, horseback riding (generally associated with hunting activities), camping (generally associated with hunting activities), photography, and backpacking. No facilities are planned. Recreational use for these activities would remain below 1,500 visitor days for the next 10 years. It is reasonable to expect recreation use to increase slightly in the future, but use is estimated to remain below 1,750 visitor days annually.

Forest Management Actions

Under the Proposed Action, harvest of 8 MMBF of commercial timber would not occur. Two hundred acres of precommercial thinning would not occur.

Livestock Management Actions

The Ferris Mountains WSA would continue to provide 2,263 AUMs in portions of six grazing allotments. Range improvements consisting of fences on the lower slopes would continue to be maintained. No new range improvements are planned.

Wildlife Management Actions

Prescribed burns on approximately 600 acres would occur on the west side of Cherry Creek to improve bighorn sheep habitat.

No Wilderness Alternative

Under the No Wilderness Alternative, all 22,245 acres of the Ferris Mountains WSA would be recommended for nonwilderness uses. The lands would be open for multiple-use management and development.

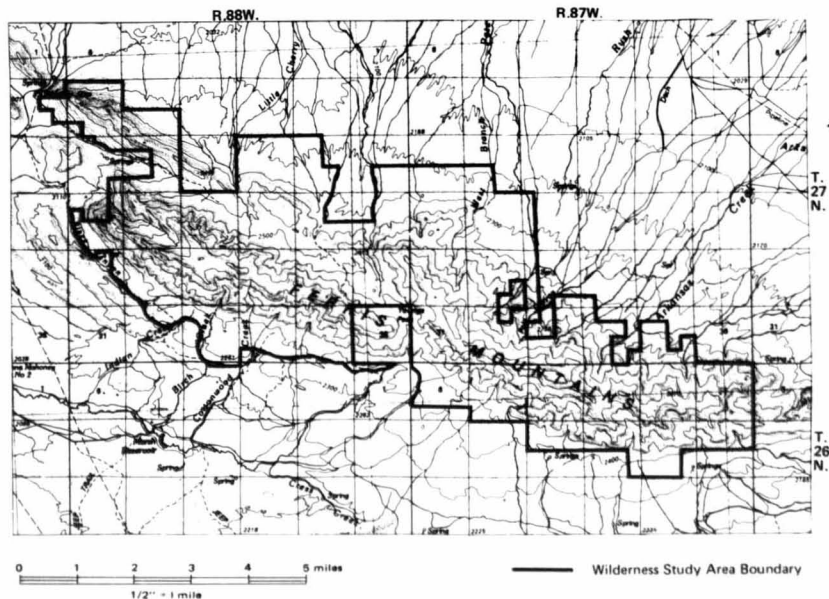
Energy and Minerals Actions

Under this alternative, the entire WSA would be open to oil and gas exploration and development. However, there is low potential for oil and gas in the WSA; therefore, no oil and gas exploration or developments are expected to occur.

It is assumed that assessment work would continue on the four existing lode claims along the WSA's eastern boundary, resulting in 80 acres of surface disturbance. No new roads would be constructed. No development (mines) is expected because of the lack of any mineral in economic quantities.

Recreation Management Actions

The entire WSA (22,245 acres) would be closed to ORVs. The new roads associated with timber harvest would not be available for public use.



Map 4
Ferris Mountains WSA
PROPOSED ACTION
(ALL WILDERNESS)

PROPOSED ACTION AND ALTERNATIVES

The WSA would be open for other activities including hunting, horseback riding (generally associated with hunting activities), camping (generally associated with hunting activities), photography and backpacking. Recreational use for these activities would remain below 1,500 visitor days for the next 10 years. It is reasonable to expect recreation use to increase slightly in the future, but use is estimated to remain below 1,750 visitor days annually.

Forest Management Actions

Under the No Wilderness Alternative, approximately 8 MMBF of commercial timber on 1,000 acres on the north side of the WSA would be harvested. Harvest would occur over the next 50 to 100 years, using clearcuts up to 25 acres in size. Within the 1,000 acres of commercial timber, about 200 acres would be precommercially thinned within the next 5 to 10 years. There would be 7½ miles of new road constructed to facilitate timber harvest. There would be a total of 1,050 acres of surface disturbance. No timber harvests would occur during winter months when big game species were utilizing their winter ranges.

Livestock Management Actions

The Ferris Mountains WSA would continue to provide 2,263 AUMs in portions of six grazing allotments. Range improvements consisting of fences on the lower slopes would continue to be maintained. No new range improvements are planned.

Wildlife Management Actions

Under the No Wilderness Alternative, Stipulation 2b would be applied to all timber harvests in order to protect nesting habitat of raptors. Prescribed burns on approximately 600 acres would occur on the west side of Cherry Creek to improve bighorn sheep habitat.

Enhanced Wilderness Alternative

With this alternative, the entire 22,245 acres of the WSA would be recommended for wilderness. Additionally, 1,800 acres of state and private in-holdings would be proposed for acquisition through land exchange or purchase and would be incorporated into the area under study (see map 5). The total acreage recommended for wilderness would be 24,045 acres.

Energy and Minerals Actions

Under the Enhanced Wilderness Alternative, energy and minerals actions would be the same as in the Proposed Action (All Wilderness). Because there are no pre-FLPMA leases in the WSA and oil and gas potential is low, no oil and gas development is anticipated in the WSA. For the purpose of analysis, it is assumed that the four existing lode claims would by virtue of a validity examination be declared null and void; hence, no mining development would be allowed. The entire 24,045 acres under this alternative would be withdrawn from all forms of appropriation under the mining law upon designation by Congress.

Recreation Management Actions

All of the 22,245 acres comprising the Ferris Mountains WSA would be closed to ORV use. Additionally, the 1,800 acres acquired from the state and private parties would be closed to ORV use after these lands were acquired by BLM. The entire 24,045 acres would be open for other recreation activities including hunting, horseback riding (generally associated with hunting activities), camping (generally associated with hunting activities), photography, and backpacking. No facilities are planned. Recreational use for these activities would remain below 1,500 visitor days for the next 10 years. It is reasonable to expect recreation use to increase slightly in the future, but use is estimated to remain below 1,750 visitor days annually.

Forest Management Actions

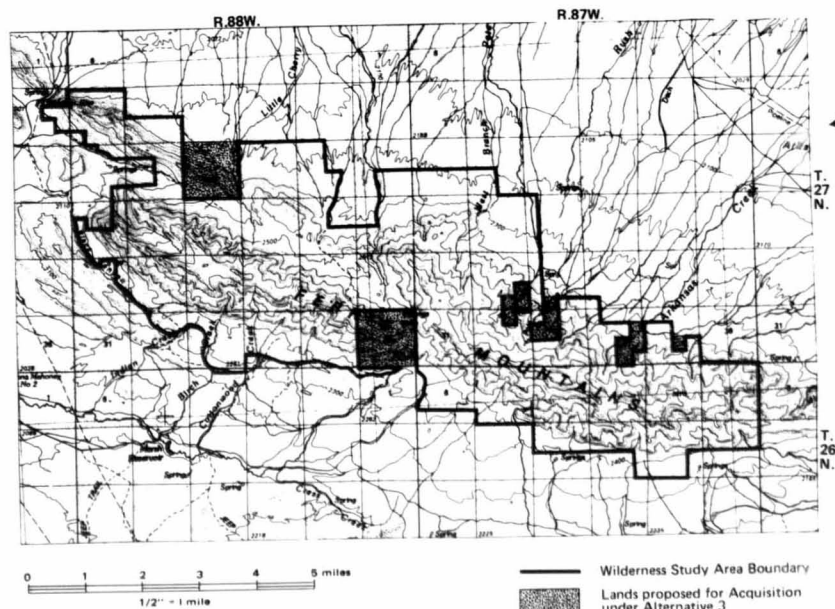
Under the Enhanced Wilderness Alternative, harvest of 8 MMBF of commercial timber would not occur. Two hundred acres of precommercial thinning would not occur.

Livestock Management Actions

The Ferris Mountains WSA would continue to provide 2,263 AUMs in portions of six grazing allotments. Range improvements consisting of fences on the lower slopes would continue to be maintained. No new range improvements are planned.

Wildlife Management Actions

Prescribed burns on approximately 600 acres would occur on the west side of Cherry Creek to improve bighorn sheep habitat.



PROPOSED ACTION AND ALTERNATIVES

TABLE 2A
COMPARATIVE ANALYSIS OF IMPACTS
ADOBE TOWN WSA

Resource	Proposed Action (Partial Wilderness/ Conflict Resolution)	No Wilderness	Partial Wilderness-2	All Wilderness
Wilderness Values	Naturalness and solitude lost on 75,110 acres in long term. Wilderness values retained on 10,600 acres.	Naturalness and solitude lost on 85,710 acres in long term. No legal protection of wilderness values on 85,710 acres.	Naturalness and solitude lost on 70,710 acres in long term; includes 1,280 acres in partial wilderness boundary. Wilderness values retained on 15,000 acres.	Naturalness and solitude lost on 39,300 acres in long term due to development of pre-FLPMA leases. Wilderness values retained on 46,410 acres.
Energy and Mineral Resources	Eighty percent of gas from 75,110 acres recovered (800 billion cubic feet); remainder closed to oil and gas leasing.	Eighty-five percent of gas recovered (850 billion cubic feet); 85,710 acres open to oil and gas leasing.	Seventy-two percent of gas recovered (720 billion cubic feet)	Thirty-five percent of gas from 39,300 acres recovered (350 billion cubic feet).
ORV Use	Twenty-five visitor days annually displaced from 10,920 acres. Insignificant impacts due to better opportunities on nearby public land.	Minor increase in vehicle accessibility; no significant impacts.	Fifty visitor days annually displaced from 16,280 acres. Insignificant impacts due to better opportunities on nearby public land.	Two hundred visitor days annually displaced from 85,710 acres. Insignificant impact due to better opportunities on nearby public land.
Cultural Resources	Cultural resource surveys on 8,554 acres; 400 sites evaluated but destroyed. All remaining sites would be largely undisturbed.	Cultural resource surveys on 9,075 acres; 425 sites evaluated but destroyed. No impacts on 76,635 acres because sites would remain largely undisturbed.	Cultural resource surveys on 7,870 acres; 370 sites evaluated but destroyed. Sites on 77,840 acres would remain largely undisturbed.	Cultural resource surveys on 3,750 acres; 175 sites evaluated but destroyed. Sites on 81,960 acres would remain largely undisturbed.
Paleontological Resources	Adverse impacts to paleontological resources on 5,884 acres due to oil and gas activities. No impacts on 77,126 acres because sites would remain largely undisturbed.	Adverse impacts to paleontological resources on 9,075 acres due to oil and gas activities. No impacts on 76,635 acres because sites would remain largely undisturbed.	Adverse impacts to paleontological resources on 7,870 acres due to oil and gas activities. No impacts on 77,840 acres because sites would remain largely undisturbed.	Adverse impacts to paleontological resources on 3,750 acres due to oil and gas activities on pre-FLPMA leases. No impacts on 81,960 acres because sites would remain largely undisturbed.
Livestock Grazing	Continue to provide 5,068 AUMs. Elimination of vehicle use on 10,920 acres would have a minimal effect on grazing management.	Continue to provide 5,068 AUMs. No impacts on grazing management.	Continue to provide 5,068 AUMs. Elimination of vehicle use on 16,280 acres would have a minimal effect on grazing management.	Continue to provide 5,068 AUMs. Increased difficulty in managing domestic sheep on winter range; may result in voluntary nonuse of 3,893 AUMs.
Wildlife	Antelope populations unaffected. Mule deer displaced off of up to 74,790 acres, but can be easily accommodated in other areas.	Antelope populations unaffected. Mule deer displaced off of up to 85,710 acres, but can be easily accommodated in other areas.	Antelope populations unaffected. Mule deer displaced off of up to 69,430 acres, but can be easily accommodated in other areas.	Antelope populations unaffected. Virtually no displacement of mule deer.
Raptors	Out of a total of 22 ferruginous hawk nests, six to eight would produce fledglings. Success rates for golden eagles and prairie falcons maintained on 10,920 acres and reduced an unknown amount on 74,790 acres.	Out of a total of 22 ferruginous hawk nests, five to six would produce fledglings. Success rates for golden eagles and prairie falcons reduced on 85,710 acres and reduced an unknown amount on 85,710 acres.	Out of a total of 22 ferruginous hawk nests, eight to ten would produce fledglings. Success rates for golden eagles and prairie falcons maintained on 16,280 acres and reduced an unknown amount on 69,430 acres.	Out of a total of 22 ferruginous hawk nests, ten to ten would produce fledglings. Success rates for golden eagles and prairie falcons maintained on 85,710 acres.

PROPOSED ACTION AND ALTERNATIVES

TABLE 2B
COMPARATIVE ANALYSIS OF IMPACTS
FERRIS MOUNTAIN WSA

Resource	Proposed Action (All Wilderness)	No Wilderness	Enhanced Wilderness
Wilderness Values	Wilderness values retained on 22,245 acres. Impacts to naturalness and solitude would not occur on 4,000 acres.	Naturalness and solitude lost or impaired on 4,000 acres. No legal protection of wilderness values on 22,245 acres.	Wilderness values retained on 24,045 acres. Impacts to naturalness and solitude would not occur on 4,000 acres.
Energy and Mineral Resources	22,245 acres closed to mineral entry and leasing.	22,245 acres open to mineral entry and leasing.	24,045 acres closed to mineral entry and leasing.
ORV Use	Ten visitor days annually displaced from 22,245 acres; insignificant impact due to better opportunities on nearby public land.	Ten visitor days annually displaced from 22,245 acres. No increase in vehicle accessibility; no significant impacts.	Ten visitor days annually displaced from 24,045 acres; insignificant impact due to better opportunities on nearby public land.
Forestry	8 MMBF harvest on 1,000 acres forgone. Timber management on remaining 8,000 acres of forested land forgone. Sales unlikely in foreseeable future.	8 MMBF harvest on 1,000 acres over next 50 to 100 years; other timber management could occur on remaining 8,000 acres of forested land, but sales are unlikely in foreseeable future.	8 MMBF harvest on 1,000 acres forgone. Timber management on remaining 8,000 acres of forested land forgone. Sales unlikely in foreseeable future.
Wildlife	No impacts. Long-term protection of wildlife habitat on 22,245 acres. Prescribed burns on 800 acres would double bighorn sheep population.	No impacts. Loss of 1,000 acres of habitat over short term while harvesting occurs. Prescribed burns on 800 acres would double bighorn sheep population.	No impacts. Long-term protection of wildlife habitat on 24,045 acres. Prescribed burns on 8,000 acres would double bighorn sheep population.
Raptors	No impacts. Long-term protection of nesting habitat on 22,245 acres.	No impacts. Nesting habitat protected because timber harvest would not occur during nesting activity.	No impacts. Long-term protection of nesting habitat on 24,045 acres.

CHAPTER 3

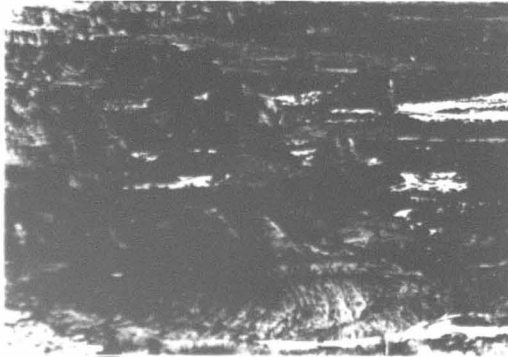
AFFECTED ENVIRONMENT

ADOBE TOWN

General Characteristics

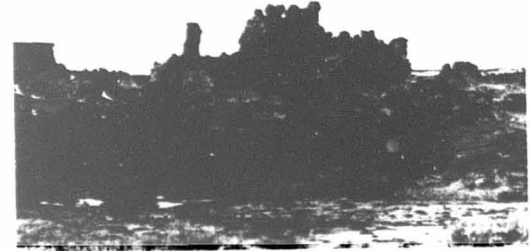
The Adobe Town WSA is located 80 miles southwest of Rawlins, about 25 miles south of Interstate 80, in Sweetwater County. The name Adobe Town has been applied to a 40 to 50-square mile area near the center of the Washakie Basin, where erosion has created unusual badland configurations.

Adobe Town is in a remote area, bounded on the west by a broad, relatively undissected, west-sloping plain that is covered with stabilized sand dunes and alluvium. The flat terrain of this plain breaks abruptly at Adobe Town Rim into a maze of badlands that form small basins, ledges, and alcoves at lower elevations east of the rim. From a few hundred feet to several miles east of Adobe Town Rim, at still lower elevations, small isolated haystack or house-shaped buttes are located (photographs 1 and 2). These give Adobe Town its name and form the area known as Monument Valley.



Photograph 1. Typical badland formations in the Adobe Town WSA.

AFFECTED ENVIRONMENT

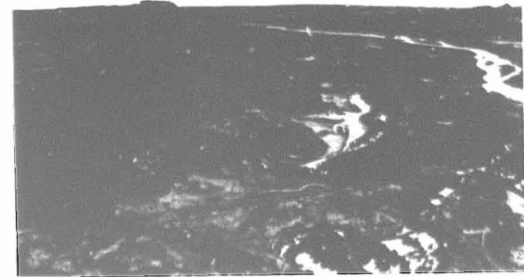


Photograph 2. Small isolated buttes with sagebrush-covered sand dune in the foreground.

This landform pattern repeats itself with relatively flat, sand-dune covered plains east of Monument Valley and gradually becomes Skull Creek Rim. Skull Creek Rim is similar to Adobe Town Rim, although it is much more extensive in both length and width. Skull Creek Rim is dissected by Sand Creek and its tributaries, creating colorful

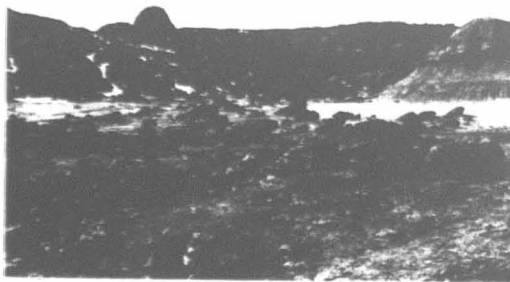
canyons and numerous small drainages (photographs 3 and 4).

The Adobe Town WSA is part of the Washakie Basin proposed National Natural Landmark. This designation is bestowed upon areas with outstanding geological and ecological features.



Photograph 3. Skull Creek Rim showing spring runoff in Sand Creek.

AFFECTED ENVIRONMENT

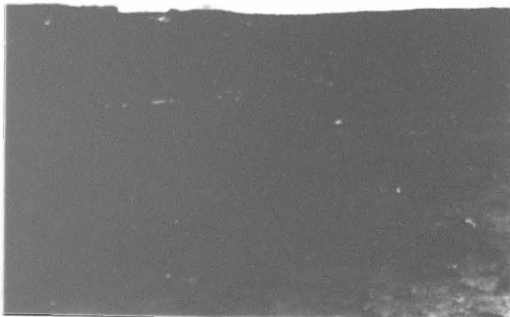


Photograph 4. Small drainage eroding Skull Creek Rim.

Wilderness Values

Size

Adobe Town is made up of two contiguous WSAs, WY-040-408 in the Rock Springs District and WY-00-401 in the Rawlins District. Together they contain 85,710 acres and constitute the largest BLM WSA in Wyoming. Size, which is one of the Adobe Town WSA's important attributes, enhances the wilderness character of the area.



Photograph 5. Past oil and gas exploration is evidenced by this dry hole marker.

Naturalness

The Adobe Town WSA exhibits a high degree of naturalness. The few man-made intrusions in the WSA are minor and consist of active and abandoned oil and gas drilling locations (photograph 5), roads, trails, and seismographic lines associated with oil and gas explorations. There are live-stock watering reservoirs, abandoned wild horse traps, and abandoned enclosures for livestock feed storage. These intrusions are not particularly noticeable and have a minimal impact on the total

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area. Many of these intrusions are difficult to find, as evidenced by reports submitted to BLM by the mineral industry during the intensive wilderness inventory (Holmes 1979).

Most of the reservoirs are small (less than $\frac{1}{8}$ acre) and were constructed to provide water for livestock. They provide an additional benefit of making water available for wild horses and wildlife. Many of the reservoirs no longer hold water, because of silting or washing out, others are in good condition. All of the reservoirs' earthen dams are overgrown with native vegetation and blend into the surroundings, most look like the adjacent landforms.

In conclusion, the area generally appears to have been affected primarily by the forces of nature; the imprint of man is minimal.

Outstanding Opportunities for Solitude and Primitive, Unconfined Recreation

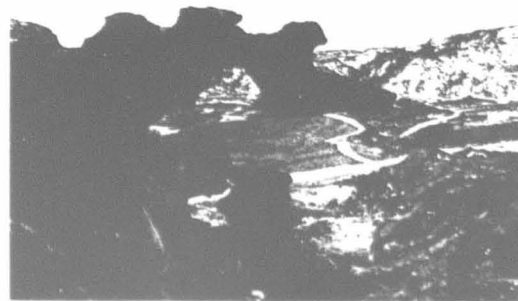
The Adobe Town WSA possesses outstanding opportunities for solitude and primitive, unconfined types of recreation. Activities identified as outstanding were hiking, sightseeing, and photography which complement each other. Short backpacking excursions could be taken, but all water

would have to be carried by the user because potable water sources would not be available. These opportunities exist throughout the WSA.

Hiking or backpacking in the area would be an interesting and educational experience, particularly for typical backpackers who have done most of their backpacking and hiking in the mountains. A hiker would have the opportunity to view the wildlife and vegetation of a high-desert ecosystem in a natural condition. A person could hike in and around the major badland features-Adobe Town Rim, Skull Creek Rim, Monument Valley, and the major tributaries of Sand Creek-and view and photograph a variety of interesting features ranging from the geological features of the area to wildlife and wild horses.

Primitive, overnight camping areas are plentiful and shade, shelter, and scenic views are available for the camper. Shelter can be found in the leeward sides of stabilized sand dunes, in draws or washes, or in the midst of the rocky, eroded rims. These types of shelters protect the user from frequent winds that are characteristic of the area.

The erosional landforms are the area's most outstanding feature. They are the focal point of the area. Although similar landforms are found elsewhere in southern Wyoming, these are perhaps the most spectacular (photograph 6).



Photograph 6. Spectacular landforms have resulted from wind and water erosion in Adobe Town. Shown above is "Puff the Magic Dragon."

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The WSA's size and topography contribute to the degree of solitude that the area provides. The WSA totals nearly 134 square miles, which is sufficient to accommodate a large number of visitors with little interaction. In Adobe Town, the visitor can disappear quickly in the rim areas by going around a corner, up a draw, or into the next canyon. The rugged topography provides seclusion throughout most of the WSA; the scenic rims provide a maze of small canyons and draws so that visitors can easily avoid the sights and sounds of others. Elsewhere the terrain is hummocky because the surface is covered by stabilized sand dunes.

Quality is a function of the combination of interrelated values that an area exhibits and the resulting uniqueness of that combination. In this regard, Adobe Town exhibits high-quality solitude and opportunities for primitive recreation.

Special Features

The Adobe Town area contains a herd of wild horses, averaging 400 animals, with a range of 300 to 500 head. The herd is currently at management level.

The area is also well known for its fossils. Fossil remains of mammals are numerous and widely distributed throughout the area. (See the Paleontological section for more information.)

Recreation

The Adobe Town WSA has been used for many years for recreational purposes by area residents. Typical activities include hunting, sightseeing, camping, and rock collecting. Recreational ORV use is estimated to be approximately 200 visitor days per year. This use is generally associated with or in support of the other activities. Hunting, sightseeing, camping, and rockhounding account for an additional 900 visitor days of use per year.

Big game hunting is the predominant recreational activity in the WSA. Adobe Town provides some of the highest quality antelope hunting in southern Wyoming. Trophy mule deer hunting is also popular in the WSA.

Cultural Resources

Field inventories indicate that the prehistoric cultural resource site density for the study area is approximately 30 sites per section, a high density of prehistoric human occupation. Cultural

resource properties in this area are generally characterized by lithic scatters, stone circle features, hearths, firepits, lithic material quarries, and rock shelter habitation sites. The prehistoric people who occupied the study area were hunters and gatherers whose movements were, to a large degree, determined by seasonal changes in resource availability. These people generally traveled in small bands, spending only a limited amount of time in any one location. A particular cultural resource site might represent a one-time use of a location or repeated use of the location for thousands of years. Diagnostic projectile points indicate nearly continuous use of the area for the last 12,000 years. At this time, no cultural resource sites recorded within the study area are listed on the National Register of Historic Places.

Although the density of cultural resource sites is estimated to be 30 sites per square mile, the information may not be statistically reliable because the sample size is very small and is not of scientific design. The field inventories that were conducted were for project-related activities and were not based on an overall scientific sampling scheme.

Paleontological Resources

The Washakie Basin, of which the Adobe Town WSA is a part, is one of the most noted paleontology areas in North America. Surface fossils of extinct mammals and reptiles are numerous and scattered throughout the WSA. Two notable mammalian fossils found in the area are the Uintathere and the Titanotheres. The Uintathere was a large mammal about the size and configuration of an African rhinoceros. The species of Titanotheres found in the WSA was a tapir-like mammal, about 40 inches in height. Later species, whose fossil remains have been found elsewhere in Wyoming, grew to be 8 feet tall, 12 feet long, and could weigh up to 4 tons (Hager 1982).

Scientific interest in the paleontology of the Adobe Town WSA is high. Turnbull (1978) notes that paleontological resources in the Washakie Basin (Adobe Town lies about in the basin's center) have been almost continuously studied since the time of the Hayden Survey of 1867 to 1878. Many specimens taken from the Washakie Basin are now in museums such as the Chicago Field Museum of Natural History. Locally, both the University of Wyoming and Western Wyoming College collect specimens from the WSA.

Most fossils are recovered as scattered surface finds in areas of exposed rock. Paleontologists often rely on chance for discoveries. Exposures that produce significant fossils, particularly verte-

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brates, are rare and consequently are of considerable scientific value and public interest wherever they are found.

Livestock Grazing

There are four grazing allotments in the Adobe Town WSA (see map 6). Three of these allotments

are in the Rawlins District, and one is in the Rock Springs District. The three Rawlins allotments are held by individuals, and the Rock Springs allotment is held by the Rock Springs Grazing Association. Of the four allotments, only a portion of each lies within the WSA boundaries. All of the allotments traditionally have been used for winter grazing of sheep, but in recent years there have been some conversions to summer grazing of cattle (see Table 3).

TABLE 3
LIVESTOCK GRAZING ALLOTMENTS
IN THE ADOBE TOWN WSA

Allotment Name	Season of Use	Class of Livestock	Total Federal AUMs	Number Federal AUMs in WSA	Percent of Total
Willow Creek (528)	Winter	Sheep	5,362	680	13
Adobe Town (502)	Winter	Sheep	1,820	175	10
Cow Creek (509)	Summer	Cattle, sheep	2,420	1,000	40
Rock Springs Grazing Association ¹	Winter	Sheep	105,000	3,213	3

¹ The Rock Springs Grazing Association allotment is a large common allotment shared by the Rock Springs Grazing Association and other users.

Access for grazing purposes is available on all of the roads and trails in the WSA. In recent years, additional roads have been built in the area to facilitate natural gas exploration and production. Maintenance of those roads and the continuing construction of new ones is improving access for livestock grazing. Some ranchers use dry washes, such as Sand Creek, for access in the winter to facilitate feeding and moving of livestock. There is some travel off of the roads, trails, or washes in the winter since heavily drifted snow occasionally blocks them. Except for the most rugged areas, access by motor vehicles to and within the area is essential in the winter to ensure adequate management of livestock.

Range improvements (such as stock water reservoirs and several miles of fence separating the Rawlins and Rock Springs districts) exist in the area. About half of the reservoirs are no longer functional because they are washed out or filled with silt. The principal use of those remaining intact is for watering livestock, wildlife, and wild horses in the summer.

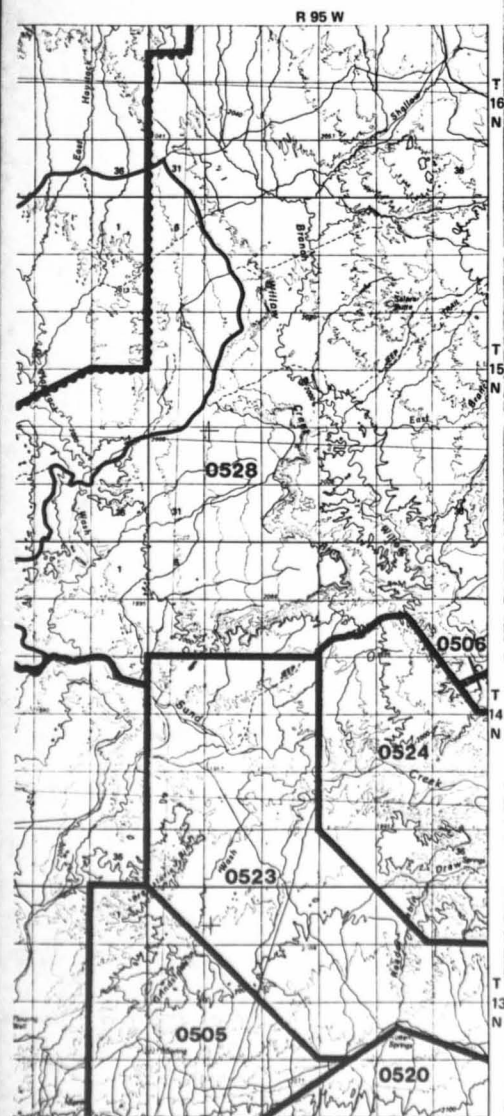
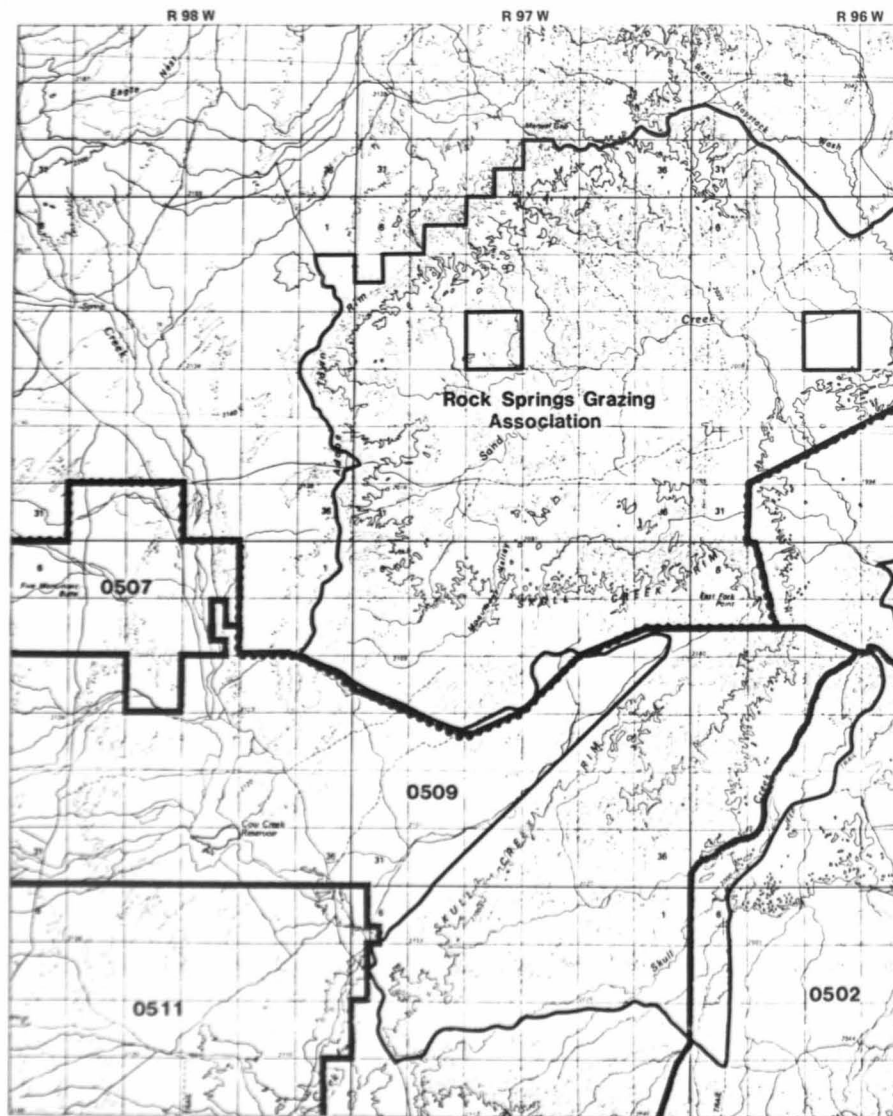
Energy and Mineral Resources

Energy Resources

The Adobe Town WSA lies near the center of the Washakie Basin, a structural and topographic basin. The Washakie Basin is considered by some geologists to be a portion of the larger Green River Basin, which covers the southwest part of Wyoming.

The Adobe Town WSA is underlain by a sequence of sedimentary rock over 30,000 feet thick. The sediments range in age from the Cambrian Flathead Sandstone to the Tertiary Washakie Formation and Quaternary alluvium and colluvium. The sediments underlying the area are nearly horizontal, and there are no known large folding or faulting patterns.

Both the U.S. Bureau of Mines and Rocky Mountain Energy Company have investigated an area west of Adobe Town WSA for oil shale potential.



- Rawlins-Rock Springs District Boundary
- Wilderness Study Area Boundary
- 4905** Grazing Allotment Number
- Grazing Allotment Boundary



Map 6
Adobe Town WSA
LIVESTOCK GRAZING ALLOTMENTS

NOTE: Elevations shown in meters above sea level.

Contour interval 20 meters

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Large amounts of relatively low-grade oil shale, averaging approximately 15 gallons per ton, were found in the La Ciede bed of the Laney Shale Member of the Green River Formation. In some areas, minable thicknesses of rock, containing up to 25 gallons per ton, were found (Trudell 1973). These oil shale beds appear to be overlain by 3,000 feet or more of overburden in the Adobe Town WSA. This is based on average dips of the rock formations and correlation with the estimated thicknesses of overlying strata. The development potential of oil shale lying 3,000 feet below the surface is low.

Coal is projected to be present in the Wasatch, Fort Union, and Lance formations and in the Mesaverde Group underlying the Adobe Town WSA. However, the coal is so deep that development is unlikely.

The Washakie Basin is presently being developed into a major gas producing province. Until 1976, most of the petroleum discovered in the Washakie Basin was in stratigraphic and structural-stratigraphic traps around the edges of the basin. The major oil reserves at that time were in the Patrick Draw area near the northwest edge of the basin. The major gas reserves were around the west, southwest, and south margins of the basin. Since 1976, there have been large increases in natural gas production in the basin. The north and east margins of the basin are being explored, and exploration is beginning in the basin's deeper portions.

Approximately 46% of the Adobe Town WSA (39,300 acres) has oil and gas leases that were issued before the passage of FLPMA. These pre-FLPMA leases are committed to unit agreements and are held by production. As a result, the lease holders are recognized as having valid existing rights. This means that they may explore, develop, and produce oil and gas, even if the area is designated as wilderness. In addition, there are approximately 25,500 acres under post-FLPMA leases, 17,710 acres unleased, and 3,200 acres of split-estate (state minerals, federal surface).

The Upper Cretaceous Lewis Shale and Mesaverde Group have been the major gas producing areas in the shallower portions of the basin. The gas appears to have resulted from low grade, thermal metamorphism of coal beds. The amount of gas generated per unit of coal through this process is dependent on the maximum temperature to which the coal has been subjected, the effective heating time of the coal, the coal rank, and the percent of volatile matter.

Natural gas reserve estimates have been made by Barlow and Haun (1979) and McPeck (1981) for the Mesaverde Group and Lewis Shale. These estimates are based on parameters such as aver-

age productive zone thickness, average porosity, reservoir pressure, reservoir temperature, gas saturation, recovery factor, and success rates as they are presently known or projected from drill holes in the basin. McPeck estimated 20.4 trillion cubic feet (tcf) total gas reserves in the Washakie and Red Desert basins, of which 10.8 tcf are between 12,500 and 18,500 feet in depth. Estimating an area the size of Adobe Town WSA at an average depth of 15,000 feet, and assuming the same geologic conditions, results in an estimate of 1.0 to 1.1 tcf of recoverable natural gas reserves underlying Adobe Town WSA. Barlow and Haun originally estimated the recoverable natural gas reserves of Adobe Town WSA to be 2.646 tcf. The Adobe Town WSA has since been reduced in size, which would reduce this original estimate to 1.969 tcf gas. Most of the parameters used in developing these two estimates were close. The primary reason for the difference in the estimates is McPeck used a 60% ultimate exploration level, whereas Barlow and Haun used 100%.

The deeper portions of Washakie Basin, including Adobe Town WSA, remain largely unexplored. The Mesaverde Group and Lewis Shale are over 15,000 feet in depth and are geopressed in this area. Formation treatment, such as hydraulic fracturing, in these deep areas has been technically impossible until very recently. In addition, there were no price incentives to produce gas from deep or tight formations before the Natural Gas Policy Act of 1978. Exploration and production in the deep basin was delayed until these events took place.

Gas discoveries have also been made in the Fort Union and Lance formations in the deep Washakie Basin. These formations have not produced gas in the margins of the basin, but they appear to contain large reserves in the deep basin.

Two wells capable of producing lie within the Adobe Town WSA. Section 2, T. 15 N., R. 96 W., contains a Lewis Formation completion without a pipeline connection. Approximately 1/2 mile of temporary access road for this well lies within the WSA. A permanent access road plus pipeline will be required before this well can go on-line. Section 20, T. 15 N., R. 97 W. contains a producible Adobe Town unit well completed in the shallower Fort Union and Lance formations. Approximately 3 miles of pipeline and access road for this well lie within the Adobe Town WSA. A 700-foot water well lies in NW 1/4 NW 1/4, Section 34, T. 15 N., R. 97 W., inside the Adobe Town WSA. The water well was left intact at the request of BLM on October 1, 1973.

Seven drilled and abandoned wells lie within the Adobe Town WSA. These wells were drilled between 1952 and 1981 and range in depth from

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3,500 to 13,000 feet. Only one of these wells was drilled deep enough to penetrate the deep potential horizons. This deeper well has provided little information due to the lack of test data. However, the well test data did show the presence of gas in the deeper formations.

Mineral Resources

A marker bed in the Adobe Town Member of the Washakie Formation in which clinoptilolite, a zeolite mineral, is abundant was identified by Roehler (1973). During the summer of 1980, BLM conducted a reconnaissance type inventory of this bed for the purposes of location, field description, and sampling. To the south of the Adobe Town WSA zeolite minerals are abundant, but the bed is contaminated in most areas with detrital material and authigenic clay. To the east and north of the Adobe Town WSA, the bed changes to a sandy tuff. The bed is projected to underlie the Adobe Town WSA, but it is at a depth where development potential is very low.

There are no mining claims in the Adobe Town WSA. The area was withdrawn from mining location by Executive Order 5327, April 15, 1930.

No uranium exploration or development has taken place in the study area because the area has been withdrawn from mineral location. The Washakie Basin, of which Adobe Town is part, has known uranium occurrences. No commercial deposits have been found. The structural nature of this sedimentary basin and the chemical and physically favorable host rocks in and adjacent to the study area, indicates the potential for significant uranium deposits.

Wildlife Resources

Pronghorn antelope and mule deer are the two big game species inhabiting the WSA. Wyoming Game and Fish Department population objectives and present population estimates for these two species are presented in Table 4.

TABLE 4
BIG GAME POPULATIONS AND SEASONAL DISTRIBUTION
ADOBE TOWN WSA

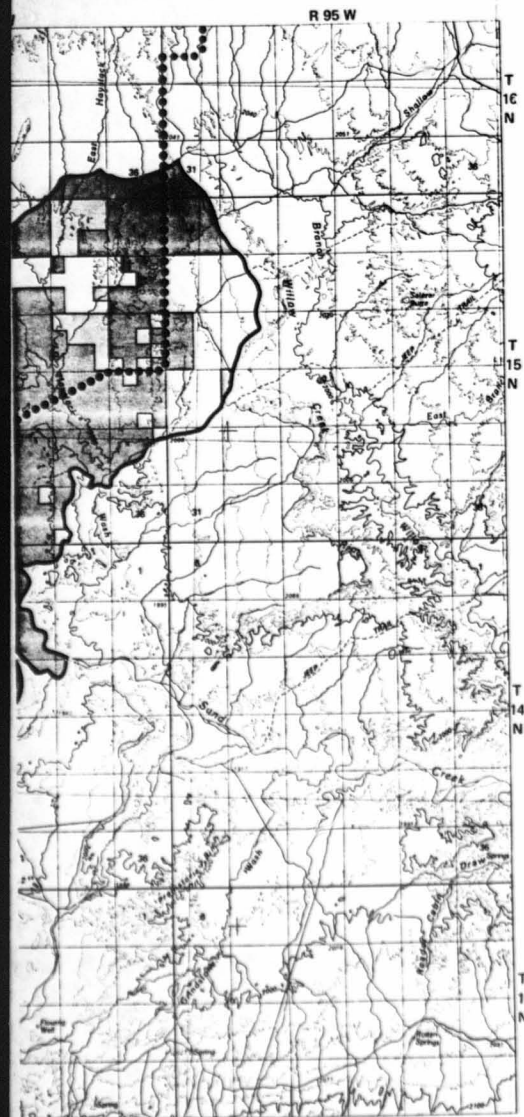
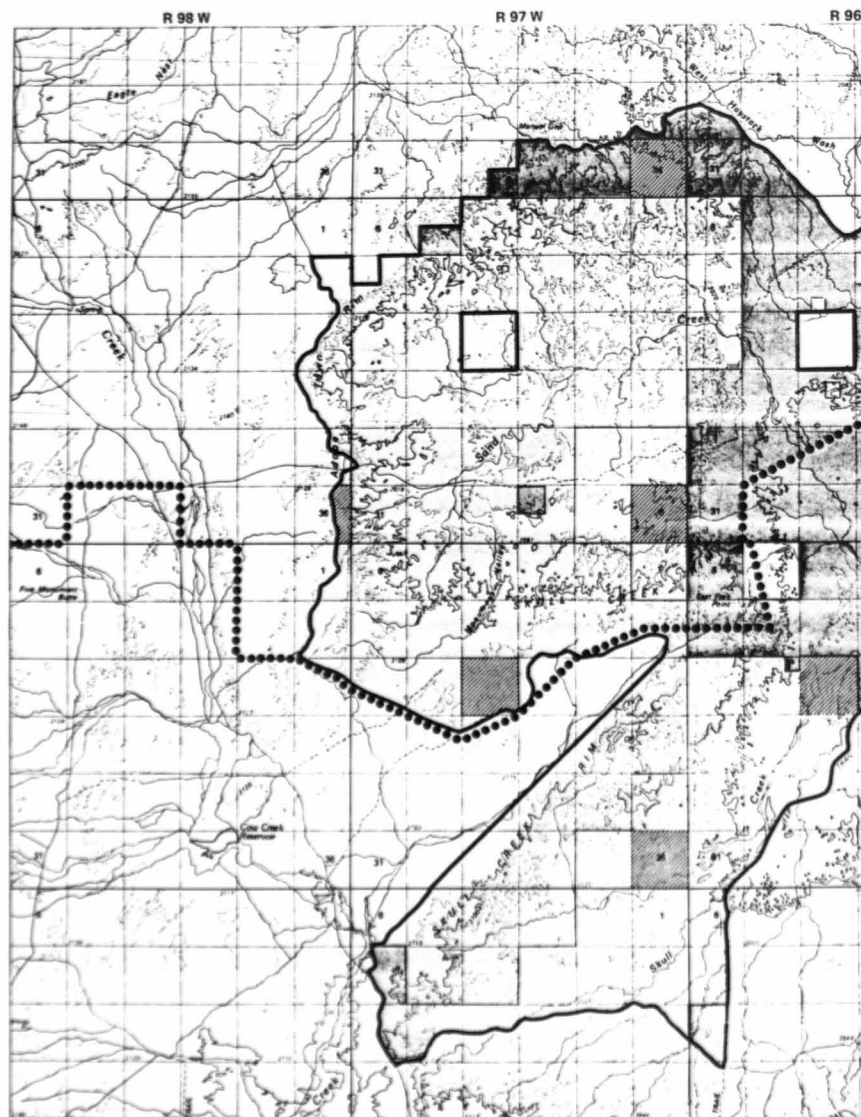
	Present Population Within the Adobe Town WSA		Present Population Within the Total Herd Unit	Total Herd Unit Population Objective ¹
	Summer	Winter		
Pronghorn	400	750	11,200-11,500	11,000
Mule Deer	185	225	18,700 +	18,700

¹ Post-hunt population objective.

Pronghorn Antelope

Antelope that inhabit the Adobe Town WSA are part of the Bitter Creek Herd Unit (Data Analysis Unit), which is located between Interstate 80 and the Colorado border, and extends west from Highway 789 to Wells Creek. In 1987, the Wyoming Game and Fish Department estimated that this herd totaled between 11,200 and 11,500 animals. The 1987-88 post-hunt objective for this herd is 11,000 antelope (Moody 1987, pers. com.). Prior to the severe winter of 1983-84 which decimated the antelope herds, the summer and winter populations inhabiting the WSA were estimated to be

445 animals and 1,191 animals, respectively. Since the 1983-84 winter, populations have been rebuilding with current estimates of 400 animals and 750 animals for summer and winter, respectively (Moody 1987, pers. com.). The wintering population may not reach previous levels for some years. The severity of the 1983-84 winter displaced many of the antelope into Colorado (Moody 1987, pers. com.). These animals have not returned. The eastern portion of the WSA is crucial winter range, and the southern portion is winter and yearlong range. The northwest portion is summer range.



- Rawlins-Rock Springs District Boundary
- Wilderness Study Area Boundary
- Post-FLPMA Oil and Gas Leases -
Leases issued after October 21, 1976
- Pre-FLPMA Oil and Gas Leases -
Leases issued prior to October 21, 1976
- ▨ Split-Estate Lands
- Unleased Lands



Map 7
Adobe Town WSA
OIL AND GAS LEASES

NOTE: Elevations shown in meters
above sea level.
Contour interval 20 meters

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The availability of free-standing water and vegetation in the preferred range type determines the overall antelope distribution pattern within the herd unit. As summer progresses, the antelope tend to concentrate in areas where water is readily available. In the fall, the animals start to migrate back to the winter ranges. As winter conditions become severe, the antelope concentrate on the crucial winter ranges where windblown slopes offer the only available forage.

Mule Deer

Mule deer that inhabit the WSA are part of the Baggs Herd Unit (Data Analysis Unit), which is located between Interstate 80 and the Colorado border, and extends west from the Sage Creek Road/Medicine Bow National Forest boundary to the Bitter Creek Road. The juniper ridges, sagebrush breaks, and eroded badlands provide high-quality mule deer habitat.

In the decade prior to the severe winter of 1983-84, the mule deer population had been steadily increasing. Summer and winter populations within the WSA prior to the 1983-84 winter were estimated to be 185 and 225, respectively. Since the 1983-84 winter, mule deer populations have been rebuilding and are estimated to have reached pre-1983 and 1984 levels (Moody 1987, pers. com.).

The 1987 population is estimated to be only slightly above the 1987-88 post-hunt objective of 18,700 animals (Moody 1987, pers. com.). The entire WSA is classified as winter and yearlong range.

Raptors

The BLM Rawlins District has attempted to inventory raptors in the WSA. However, because of the rugged terrain and inaccessibility of the area, a complete raptor survey has not been accomplished. An abundance of prey (jack rabbits, cottontails, and other small mammals) and numerous cliffs makes the WSA quality raptor habitat. Seven ferruginous hawk nests, nine golden eagle nests, one prairie falcon nest, and one red-tailed hawk nest have been found in the area.

The ferruginous hawk is a Category II species for threatened or endangered species listing. This means that there is inadequate data to list the species at this time, but additional data may provide the necessary information to determine whether or not the ferruginous hawk should be included on the threatened or endangered species list. The ferruginous hawk is extremely sensitive to distur-

bance during nesting. Studies in the Rawlins District have shown that the nest failure rate for ferruginous hawk to be 55% due to natural predation, nonspecific human contact, and unknown causes.

In the Adobe Town WSA, it is estimated that there is up to 50,000 acres available for nesting, with each nest requiring 2,300 acres. The nesting habitat is primarily in the badlands portion of the WSA (the western half and the Adobe Town Rim-Skull Creek Rim area). As a result, it is projected that there are 22 active ferruginous hawk nests in the Adobe Town WSA.

FERRIS MOUNTAINS

General Characteristics

The Ferris Mountains WSA lies in northwestern Carbon County, 45 miles north of Rawlins. The Ferris Mountains are a small mountain range, bounded on the south by the Great Divide Basin, on the west by Highway 287 and the small settlement of Muddy Gap, on the north by gently rolling sagebrush plains, and on the east by the Seminole Mountains. Along the entire length of the range, deep canyons and steep slopes predominate; meadowlands are limited in extent (photograph 7). The extreme local relief, coupled with the rugged nature of the topography and the effort one must exert to travel in the area, all contribute to the perception that the Ferris Mountains are larger than they actually are.

From a distance, the Ferris Mountains appear to be dominated by forest vegetation (lodgepole pine, Douglas-fir, limber pine, subalpine fir, Englemann spruce, juniper, and aspen), but they also contain unforested slopes covered by shrubs, grasses, and forbs. In addition, grassy meadows and riparian zones of willow, water birch, and herbaceous vegetation occur, along with drier, open parks (photograph 8). The mountain forests have burned several times in recorded history, and as a result, forests of varying ages occur on the slopes. The shrubby and herbaceous plants are used as food by livestock and many species of wildlife. The forest provides shelter for livestock and wildlife and, in addition, escape cover for wildlife.

There are 520 acres of private inholdings in the Ferris Mountains WSA. Negotiations are currently underway with the private landowner for an exchange of these lands for comparable public lands outside of the WSA.

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Photograph 7. View of the Ferris Mountains from the west showing steep slopes and deep canyons.



Photograph 8. A view showing spruce-filled drainages and unforested slopes.

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Wilderness Values

Size

The Ferris Mountains WSA is 22,245 acres in size. Combined with the rugged terrain and forest cover, size enhances the WSA's wilderness character.

Naturalness

The Ferris Mountains are in a natural state, essentially roadless and rugged. There are a few man-made intrusions in the area. These consist of one abandoned washed out access road and an abandoned mineral exploration area known as the Babbs Mine. Exploration activity ceased in the early 1970s after an unsuccessful search for economic quantities of minerals. The scars left by the exploration activity itself remain. The access road was closed by BLM in 1978. After the closure, the road washed out to the point where it is no longer passable. Reclamation of the road and mining scars are scheduled for the summer of 1987. This will, for all practical purposes, eliminate the remaining visual intrusion. The Babbs Mine area is visible from only a few locations in the WSA. It has little if any effect on the naturalness of the area as a whole. The naturalness and pristine nature of the mountains is probably the most significant wilderness value that the WSA possesses.

Outstanding Opportunities for Solitude and Primitive, Unconfined Recreation

The Ferris Mountains WSA provides a number of classic-wilderness land-based recreational opportunities. They include viewing scenery, hiking, horseback riding, camping, hunting, studying nature, and mountain climbing.

The WSA's size and topography combine to create outstanding opportunities for solitude. Visitors to the area would be able to avoid the sights and sounds of others and find a secluded spot in this rugged area. Major canyons distributed throughout the WSA offer places to escape the activities of others.

Special Features

The Ferris Mountains WSA provides unusual and spectacular scenery. The mountains rise abruptly from Highway 287, providing beautiful scenery for travelers in south-central Wyoming. Along the southern flank of the mountain, a for-

mation of limestone outcrops provides a prominent white band several miles long. It is an outstanding scenic feature that is visible for many miles and gives this mountain range regional recognition. In addition, the Ferris' elk and bighorn sheep populations attract visitors to the area. These big game animals attract visitors not only for hunting, but also for nonconsumptive uses such as photography.

Recreation

The Ferris Mountains provide a variety of primitive recreational activities. They include hunting, fishing, sightseeing, hiking, camping, backpacking, and horseback riding. Hunting, hiking, and sightseeing are the primary attractions, those which generate the majority of the visits to the area (photograph 9). These activities contribute an 1,000 visitor days of use per year. Recreational ORV use is estimated to be approximately 150 visitor days annually. Most if not all ORV activity is in support of the primary activities previously noted.

Recreational ORV use contributes such a small portion of total use in the WSA because of the limited number of roads therein and the rugged terrain thereof. Only 1½ miles of very rough four-wheel drive two-track ways are passable by vehicles and these are limited to the periphery of the WSA.

Forestry Resources

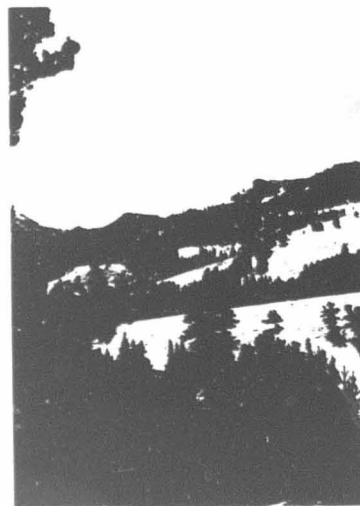
The Ferris Mountains WSA has 9,000 acres of forested land of which 1,000 acres are classified as commercial timber. The main commercial tree is lodgepole pine, most of which is currently poletimber-sized. There are also small stands of Douglas-fir, subalpine fir, and ponderosa pine. The commercial timber is located on the middle elevations on the north side of the Ferris Mountains, essentially dissected by the Cherry Creek drainage. Various forest insects and diseases are present in the WSA. These problems affect the forest's health to some degree, but are not considered significant.

Energy and Mineral Resources

Energy Resources

The Ferris Mountains are located on the south flank of the Sweetwater Arch, which is a broad

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Photograph 9. Ferris Mountains provide a scenic environment for recreation activities. The rough topography limits the construction of roads and recreation facilities.

northwest-southeast trending uplift in central Wyoming that stretches from the Wind River Mountains to the Freezeout Hills. A series of faults define the southern boundary of this uplift. The Emigrant Trail thrust fault extends from the Muddy Gap area northwestward for approximately 50 miles. At least six mineral exploration drill holes intersect this fault. The northeast plate of the fault overlies the southwest plate at a 20 to 35 degree angle. Precambrian crystalline rocks have been placed over Paleozoic and Mesozoic sediments by a throw, at some points, of over 15,000 feet. To the east of the Ferris Mountains, near the north edge of the Hanna Basin, there is evidence to indicate that some thrusting has occurred. This thrusting has buried sediments beneath the Shirley and Seminole mountains.

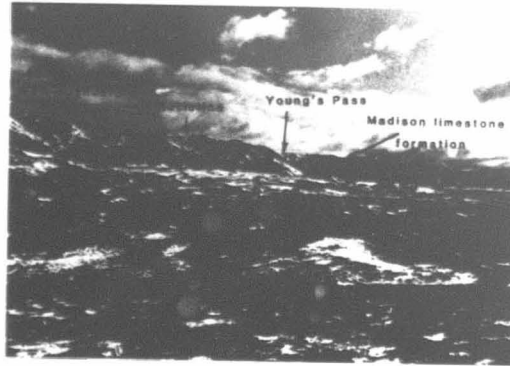
The conventional interpretation of the geology of the Ferris Mountains is that they were formed by nearly vertical uplifts (Love 1970). As a result, oil and gas potential is considered to be quite low.

There are no pre-FLPMA leases in the Ferris Mountains WSA. There are 8,640 acres of post-FLPMA leases and 13,605 acres of unleased lands in the WSA.

Mineral Resources

The Ferris Mountains consist of two anticlines trending N. 70 degrees W. which are separated by a similar structure called the Young's Pass Syncline (photograph 10). Each of the two large anticlines expose blocks of Precambrian rocks. These Precambrian rocks are of igneous origin and vary in composition from diorite to granite. Geologic structures within the Precambrian rocks include shear zones and emplaced veins and dikes of various rock types, including pegmatite, calcite, quartz, and mafic rocks. The shear zones occur most often in zones of weakness where veins and dikes have been emplaced, but they

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Photograph 10. Some geologic and topographic features of the Ferris Mountains, also occur in the country rock.

The shear zones often produce a gneissic texture in the shear zones themselves (Masters 1977).

Sedimentary rocks range from the Cambrian Flathead Sandstone through Quaternary pediment gravels, colluvium, and alluvium. Because of the steep dips and varying resistance to erosion, dip slopes of many sedimentary rock units can be observed along the south slope of the mountains. The Mississippian Madison Limestone, as an example, is present as a prominent silver-white feature on the south slope.

The larger hardrock-mineral prospect sites in the Ferris Mountains are located in two areas. The Cherry Creek/Babbs Mine area is located near Young's Pass, and the Spanish Mines area is located adjacent to the Ferris Mountains WSA on the east end. Small individual prospect pits are scattered throughout the remainder of the WSA. There are no mining claims in the Cherry Creek/Babbs Mine area. Portions of four mining claims, totalling about 80 acres, are located on the eastern edge of the WSA. They are part of the Spanish Mine block of claims which were located in October 1972 and are in the eastern half of Section 1, T. 26 N., R. 77 W. The assessment work is current as of 1986. There has been no development work on these claims.

The Cherry Creek/Babbs Mine area contains two adits and one large dozer cut. This area was reportedly explored for copper and tungsten during the late 1950s and early 1960s. Mr. William H. Wilson of the Wyoming Geological Survey exam-

ined this area on October 8, 1955, and noted two types of mineralization: (1) copper-quartz veins and (2) pyrite and chalcopyrite which is disseminated in and forms veinlets in the brecciated and silicified country rock. Traces of scheelite, a calcium tungstate, were found and a slight amount of radioactivity was attributed to the presence of allanite, a silicate. The former claimant in the area submitted a report by John P. Ely, consultant geologist, discussing a 1-foot thick quartz vein containing 10% copper, 5% tungsten, 0.11 ounces gold per ton, and 1.72 ounces silver per ton. This information does not correlate with BLM sampling in the area. The main Babbs Mine adit was mapped and sampled during the autumn of 1978 by BLM geologists. Four samples were taken from the quartz vein on which the adit was driven. The maximum copper content in one sample was 0.45%, with the average copper content being 0.19%. The maximum tungsten content was 37 parts per million (ppm). (One ppm is equal to 0.0001%. Elements present in less than 0.01% are expressed in ppm.) All gold contents were less than 0.02 ppm and silver was less than 1 ppm. The copper mineralization was sporadic and mostly in the oxidized form, although some sulfide minerals were found.

The dozer cut located above this adit was also examined on the same dates. The only mineralization observed was disseminated in the country rock. Five samples were collected from this working. The samples were assayed and the maximum value were 2.40 ppm gold, 6 ppm silver, 0.47%

copper, and 115 ppm tungsten. Average values were 0.63 ppm gold, 2.4 ppm silver, 0.32% copper, and 33 ppm tungsten.

Most of the prospect pits scattered throughout the remainder of the WSA are small, the typical size being 2 to 4 feet deep and 3 to 5 feet across. They were generally dug into quartz veins that indicated the presence of copper. Some of the prospect pits are located on shear zones. Of all the prospect pits sampled, the highest copper content in any sample was 1.4%. Many of the samples contained less than 0.1% copper. Other metals were present in lesser amounts. Most of the quartz veins are discontinuous in nature being traceable for only a few feet outside the prospect pit.

The Spanish Mines area, bordering the Ferris Mountains WSA on the east, contains numerous prospect pits and at least five adits. The Spanish Mines area is discussed by both Hendricks (1943) and Haff (1944). Hendricks examined some of the workings, sampled them, and concluded that the property showed no ore reserves and only slight mineralization of extremely low values. Mr. Haff examined the area and noted that the mineralization consisted of galena (lead sulfide), pyrite (iron sulfide), chalcopyrite (copper-iron sulfide), limonite (iron oxide), and traces of azurite and malachite (copper carbonates). Haff concluded that the area is in a structurally favorable environment with evidence of relatively strong local mineralization and intense hydrothermal action as suggested by conspicuous mineral alteration, particularly serpentinization. The claimant, Mr. William Burnside, reported that he made discoveries of commercial deposits of silver, lead, cobalt, and talc in the summer of 1973. No data are available on deposit size or grade and no serious development work has been done for at least 4 years, although assessment work is continuing. A BLM inventory of the Spanish Mines area revealed most of the workings to be on quartz or quartz-chlorite veins. Anomalous concentrations of lead, arsenic, and copper were present in various samples taken during this inventory. The BLM inventory concluded that no ore bodies were presently identified in the Spanish Mines area. The geologic conditions of the Spanish Mines area indicate a moderate potential for accumulation of mineral resources. The Ferris Mountains, outside the Spanish Mines area, have a low to moderate potential for the occurrence of mineral resources. A combined USGS and Bureau of Mines mineral report will be done prior to submission to Congress.

AFFECTED ENVIRONMENT

Livestock Grazing

Six operators graze livestock within the boundaries of the Ferris Mountains WSA. The majority of the area is used for grazing cattle, although sheep occasionally use the lower slopes on the southeast end of the mountain. In spite of the steepness and ruggedness of the mountains, livestock graze most of the WSA. During the summer months, for example, cattle may be observed on the summit ridge. Livestock grazing occurs during the months when the area is free of snow, usually from May through October.

Range improvements are limited to fences along the lower slopes of the WSA. Herding of livestock within the core of the Ferris Mountains has always been done on foot or horseback.

There are six grazing allotments in the area that are made up in part by lands in the Ferris Mountains WSA. In general, only a small portion of each allotment is contained within the boundaries of the WSA, both in terms of acreage and in terms of livestock forage.

Wildlife Resources

Current Wyoming Game and Fish Department population objectives and present population estimates for the three major big game species (elk, deer, and bighorn sheep) are presented in Table 5. The population objective for each big game species is established and managed by herd unit. The WSA does not encompass the entire herd unit for any of the species. For elk and bighorn sheep, the WSA comprises a large portion of the habitat within the herd unit. For other species, such as antelope, the WSA makes up a very small portion of the habitat within the herd unit. Elk are currently above the objective level and bighorn sheep and mule deer are below objective level.

Elk

The Ferris elk herd was established through a transplant of 25 Yellowstone elk in 1963 and 1964. Since that time, the herd has dispersed throughout the Ferris and Seminoe mountains and reached the population objective of 350 animals in the late 1970s. In 1984, a slight decline to 250 animals occurred, mainly because of excessive harvest and immigration to the Green Moun-

AFFECTED ENVIRONMENT

TABLE 5
FERRIS MOUNTAINS BIG GAME POPULATIONS¹

Species	Present Population Within the Ferris Mountains WSA	Present Population Within the Total Herd Unit	Herd Unit Objective
Elk	375	424	350
Bighorn Sheep	60	180 ²	300
Mule deer	300	3,800	5,000

¹ Wyoming Game and Fish Department annual big game herd unit reports and personal communication with Greg Hiatt, WGFD biologist.

² Revised Ferris bighorn sheep herd, 1986 post-season population estimate 100-150 (personal communication with Greg Hiatt, WGFD biologist).

tain herd. More conservative harvest seasons have been initiated from 1979 to 1985 through a reduction in the number of permits, which resulted in a population increase above the management objective. In 1986, a liberal season was initiated on the Ferris Mountain portion of this elk herd to bring this herd down to objective.

The segment of the herd (about 375 animals) that inhabits the Ferris Mountains WSA winters from the east fork of Pete Creek to Little Cherry Creek near the base of the mountains. However, in the most severe conditions, these animals move north toward the Sentinel Rocks and Point of Rocks where windswept ridges are used as foraging sites. During the summer, these elk move atop the higher ridges throughout the mountain range, with a few cows and calves remaining in the lower riparian habitats and aspen stands.

Bighorn Sheep

Historical accounts from early explorers and settlers record the presence of bighorn sheep along the Sweetwater River, which probably included the Ferris Mountains. However, as in other areas throughout the west, this bighorn population disappeared around the turn of the century.

The first recorded attempt by the Wyoming Game and Fish Department to establish a bighorn sheep herd in the Ferris and Seminoe mountains was in February 1958, when seven animals were transplanted from the Whiskey Mountain herd near Dubois. Subsequent transplants added 13 sheep in December 1958 and 18 sheep in March

1967. A harvest was attempted in 1962 and 1963, with one legal ram taken. The season was later discontinued because of a lack of harvestable animals.

Thirty-seven bighorn sheep were released in the Seminoe Mountains in December 1976 and 19 more in 1980. During this time period, six to twelve of these sheep were thought to be residents of the Ferris Mountains. In 1985, an additional 100 bighorn sheep were released on the southwest slopes of the Ferris Mountains. Dispersal of those sheep from the release site was extensive, presumably due to the heavy snowfall that covered the release site prior to the release.

The present population estimate for this herd is 180 bighorn sheep. The management objective for this herd is 300 bighorn sheep. Lack of in-migration has been identified as a factor in the inability to reach population objectives.

Rocky Mountain bighorn sheep are characterized as mountain dwellers with a strong affinity for rugged, steep, precipitous terrain or open ridges and slopes. These animals appear to thrive on late, successional mountain grassland communities where grass and grass-like plants dominate, with some shrubs available (Longhurst 1977).

The habitat requirements for bighorn sheep seem to be keyed to good foraging sites near escape cover (terrain). These animals prefer open grassy ridgetops, slopes, or benches within 100 meters of rocky outcrops, precipitous cliffs or steep rocky slopes. During light, powdery snowfall, steep slopes with good grass production are preferred. However, when snow conditions are crusted or over 2½ feet deep, windblown ridges

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are used. Summer habitat consists of lush grassy slopes and rocky areas near open water. During lambing (first and second week of June), the ewes and lambs are restricted to rugged, rocky outcrops and cliff areas that provide security against predators.

Bighorn sheep are generally tolerant of human intrusion, depending on hunting pressure and human encounters. Unhunted and unharassed sheep frequently can be closely approached by observers, but hunted populations may retreat long distances, indicating that sheep learn to fear man. Geist (1971) observed that bighorns will abandon areas when they are harassed. During severe winter periods, any factor that increases energy expenditures or decreases forage intake can be debilitating.

Raptors

Because raptors occupy a position at the top of the food chain, they are considered important nongame species. Not only do raptors serve as biological indicators of environmental quality, they also contribute to the "wilderness experience" when viewed by nonconsumptive wildlife users. The rocky cliffs that make up part of the Madison Formation in the WSA provide excellent nesting habitat for many raptors, particularly prairie falcons and golden eagles. Twelve active prairie falcon aeries, three active golden eagle nests, one active Swainson's hawk nest, and one active Cooper's hawk nest have been found within the WSA. Other raptor nests are believed to occur within the WSA but intensive inventories have not been completed.

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

ADOBE TOWN

Proposed Action (Partial Wilderness/Conflict Resolution Alternative)

Under the Proposed Action, 10,920 acres of the Adobe Town WSA would be recommended for designation as wilderness. The remaining 74,790 acres would be recommended for nonwilderness. The primary impacts under this alternative relate to oil and gas development and the resultant impacts on wilderness values.

Impacts on Wilderness Values

Wilderness values on 10,920 acres of the WSA would be protected by legislative mandate, while 74,790 acres would not receive the special legislative protection provided by wilderness designation.

Under this alternative, no oil and gas activity would occur on the 6,840 acres of post-FLPMA leases and unleased land within the 10,920 acres recommended for wilderness. Wilderness values of naturalness and solitude would thus be preserved on 6,840 acres. Two wells would be located on the 4,080 acres of pre-FLPMA leases within the partial wilderness boundary. This would result in the loss of wilderness values on 84 acres of surface disturbance and an additional 236 acres adjacent to the operations within the designated portion. Little activity is expected in the short term but in the long term, development would be expected. Impacts would be further minimized because the well locations are expected to be within 1 mile of the boundary of the partial wilderness.

The 74,790 acres of the WSA recommended for nonwilderness would be open to oil and gas development. Because of the expected spacing of wells, the road and pipeline network, and other related facilities, wilderness values would essentially be lost on the entire 74,790 acres. While little oil and gas activity is expected in the short term, it is anticipated that the area would eventually reach full development. Thus, wilderness values of naturalness and solitude would be lost in the long term on the 74,790 acres recommended for nonwilderness.

An estimated 25 visitor days annually of recreational ORV use would be eliminated from the wilderness portion of the WSA. Although encounters between recreational ORV users and other recreationists are infrequent at current levels of use, the elimination of ORV use would benefit the wilderness value of solitude because visitors would not encounter or hear ORV users in the area. Beneficial impacts on naturalness due to elimination of ORVs would be negligible because current use levels are quite low.

Sights and sounds from recreational ORV use in the nondesignated portion of the WSA would have an adverse impact on solitude. The impact would be minimal because ORV use is currently estimated to be less than 175 visitor days annually. Recreational ORV use is expected to remain below 300 visitor days annually for the foreseeable future, so the long term impact of ORV use on the wilderness value of solitude would be negligible.

Conclusion: Wilderness values of naturalness and solitude would be protected on 10,600 acres of the Adobe Town WSA. Anticipated oil and gas activity would result in the loss of wilderness values on 75,110 acres in the long term.

Impacts on Recreational Off-Road Vehicle Use

An estimated 25 visitor days annually of recreational ORV use would be eliminated from the 10,920 acres designated as wilderness under this alternative. Future opportunities would be forgone. However, the terrain of the WSA is not conducive to ORV use and there are similar or superior opportunities for ORV use on public land throughout the region. Any ORV use displaced from this portion of the WSA upon designation would be absorbed on the surrounding public land.

Recreational ORV use in the 74,790 acre nonwilderness portion of the WSA is projected to remain below 300 visitor days annually for the foreseeable future. While 490 miles of new road is anticipated in conjunction with oil and gas development, recreational ORV use is not expected to increase dramatically, primarily because of the area's isolation.

Conclusion: Recreational ORV use is expected to remain below 300 visitor days annually in the 74,790 acres recommended for nonwilderness. ORV use of 25 visitor days annually would be eliminated from the 10,920 acres recommended for wilderness. The impact of this action on recreational ORV use in the Adobe Town WSA would be minimal because of similar or superior opportunities for ORV use on surrounding public land.

Impacts on Cultural Resources

Oil and gas development is expected to physically disturb 8,500 acres within the 74,790 acres of nonwilderness under this alternative. Cultural resource surveys would be required on the disturbed acreage, resulting in inventory and evaluation of an estimated 400 cultural resource sites. This represents about 10% of the total estimated number of sites in the WSA. Inventory and evaluation of these sites would enhance knowledge about the pattern of past human activity in the WSA.

However, these sites would necessarily be destroyed in the process of salvaging them prior to surface disturbance. In so doing, features that may not be important today, but could be extremely valuable in the future, would be lost. This also eliminates any of these sites from being preserved in place for future study.

In the 10,920 acres recommended for wilderness designation, surface disturbance would be minimal on all but 320 acres (pre-FLPMA lease developments). Cultural resource sites would remain largely undisturbed for future scientific study and interpretation of the resource values to the public.

Conclusion: Surface disturbance on 8,584 acres would result in the inventory and evaluation of about 10% of the WSA's cultural resource sites. This would enhance the knowledge about the pattern of past human activity in the WSA, but the sites would necessarily be destroyed and there would be no opportunity for preservation of these sites. Cultural resource sites on the remaining 77,126 acres would remain largely undisturbed for future study.

Impacts on Livestock Grazing

The Proposed Action would maintain the current level of 5,068 AUMs in the WSA. Maintenance and construction of range improvements would continue as long as that activity did not impair wilderness values.

Impacts on livestock grazing management in the portion of the WSA recommended for wilderness would be minimal because the area is essentially roadless. That portion of the Rock Springs Grazing Association Allotment within the wilderness boundary is not normally used in the winter for domestic sheep grazing because of its isolation. The Cow Creek Allotment is summer range, so vehicle use is not critical to efficient and safe use of the area. None of the Adobe Town Allotment lies within the partial wilderness boundary. Only a small fraction of the Willow Creek Allotment lies within the wilderness boundary and its isolation makes its use impractical under any designation.

There would be no impacts on livestock grazing in areas outside of the portion of the WSA recommended for wilderness designation. Surface disturbance would result in a loss of less than 1% of the total AUMs in the allotments containing the WSA.

Conclusion: The Adobe Town WSA would continue to provide 5,068 AUMs. Vehicle use would be eliminated in the portion recommended for wilderness (10,920 acres), but the effect would be minimal because this area's isolation limits its utilization in winter under any designation.

Impacts on Energy and Mineral Development

There are 4,080 acres of pre-FLPMA leases within the partial wilderness under the Proposed Action. Development is not expected on most of these leases because of the area's rugged terrain, drainages, and inaccessibility. However, two wells (disturbing an estimated 84 acres) could be drilled that would be in locations of gentler slopes. Development would not occur on the 6,840 acres of post-FLPMA leases and unleased land within the partial wilderness.

That portion of the WSA not proposed for wilderness under the Proposed Action (74,790 acres) would be available for development. About 203 wells would be drilled using a 320-acre spacing, in areas not exceeding 25% slope or within 500 feet of surface water and riparian areas, except where an approved plan of development shows that development could occur without significant impacts on other resource values.

Thus, considering the acreage undevelopable because of terrain and drainages, along with the acreage within the partial wilderness boundary, the Proposed Action would result in approximately 80% of the WSA's natural gas reserves being recovered (800 bcf).

ENVIRONMENTAL CONSEQUENCES

Conclusion: The Proposed Action would allow for recovery of 80% of the natural gas on 75,110 acres within the Adobe Town WSA.

Impacts on Paleontological Resources

Development of natural gas in 75,110 acres would result in about 8,584 acres of surface disturbance due to drill pads, roads, and pipelines. Except for obvious features such as bones, paleontological resources are not easily recognized by untrained individuals. Even though BLM requires that sites discovered during the course of work be reported to BLM, sites are likely to be destroyed through the failure of the operator to recognize features as important paleontological remains. Therefore, paleontological resources on 8,584 acres could be destroyed without any knowledge of the sites' existence. Conversely, paleontological resources on the 72,126 acres recommended for wilderness would remain largely undisturbed and would be available for scientific study.

Conclusion: Destruction of paleontological resources would occur on 8,584 acres due to development of oil and gas resources. Paleontological resources would remain largely undisturbed on 77,126 acres because there would be no surface disturbance from oil and gas activities.

Impacts on Antelope and Mule Deer

In the 10,920 acres proposed for wilderness designation under the Proposed Action, the loss of antelope and mule deer habitat would be insignificant. The two natural gas wells would not significantly reduce the amount of habitat available to these two species.

In the 74,790 acres not recommended for wilderness designation, there would be a temporary loss of 8,500 acres of antelope habitat during oil and gas operations. There would also be some increased stress on a small area of antelope crucial winter range. In light of the antelope's ability to habituate to human activity, neither the amount of habitat loss nor the increased stress while on crucial winter range would significantly affect the antelope population.

Mule deer would experience an effective habitat loss of 74,790 acres. This includes the actual surface disturbance and avoidance zones around areas of concentrated human activity. Development activities could displace the herd from the entire WSA or could concentrate the population into the 10,920-acre portion recommended for wilderness. However, the number of mule deer within the WSA is small compared to the total herd

unit, and crucial winter range is not involved. Further, additional habitat is available in adjacent areas outside of the WSA. Therefore, assimilation of the herd into adjacent areas would be easily accommodated. Overall, herd unit populations would not be significantly affected.

Conclusion: The antelope population in the Adobe Town WSA would be unaffected by the Proposed Action. Between 40,000 and 74,790 acres of mule deer habitat could be lost, resulting in displacement of the herd from the WSA. However, assimilation of the herd into areas outside the WSA would be easily accommodated. Overall, herd unit populations would not be significantly affected.

Impacts on Raptors

In the 10,920 acres recommended for wilderness under the Proposed Action, raptor nest failures would be limited to those caused by natural occurrences. The fledgling success rate for ferruginous hawks would be expected to range between 45-55%. There are projected to be five active nests in this portion of the WSA. Therefore, two to three nests would produce fledglings.

In the 74,790 acres recommended for nonwilderness, fledgling success rates would decrease because of the projected natural gas development and its related maintenance activities. For ferruginous hawks, success rates would be expected to drop to 25-30%. There are projected to be 17 active nests in the nonwilderness portion of the WSA. As a result of development activities, only four to five nests would produce fledglings.

No data exist to indicate fledgling success rates for golden eagles or prairie falcons. It is known, however, that these two species are more tolerant of human disturbance than are ferruginous hawks. Thus, in the 10,920 acres recommended for wilderness, golden eagle and prairie falcon fledgling success rates would be those occurring naturally. In the 74,790 acres of nonwilderness, fledgling success rates for golden eagles and prairie falcons would decrease at an unknown rate, but would probably not decrease to the same degree as the ferruginous hawks.

Conclusion: Under the Proposed Action, between six and eight active ferruginous hawk nests (out of a total 22) would produce fledglings. Fledgling success rates for golden eagles and prairie falcons would remain the same in the 10,920 acres recommended for wilderness. In the 74,790 acres of nonwilderness, fledgling success rates for these two species would decrease to an unknown level, but would probably not decrease to the same degree as for ferruginous hawks.

ENVIRONMENTAL CONSEQUENCES

No Action - No Wilderness

Under the No Action - No Wilderness Alternative, the entire 85,710 acre Adobe Town WSA would be recommended for nonwilderness uses. The primary impacts of this alternative relate to impacts on wilderness values from oil and gas development.

Impacts on Wilderness Values

The entire WSA would be recommended for nonwilderness designation and none of the wilderness values on 85,710 acres would receive the special legislative protection provided by wilderness designation. All 85,710 acres would be open to oil and gas leasing and development. Because of the expected well spacing, roads, pipelines, and other facilities, wilderness values would essentially be lost in the entire WSA. While little oil and gas activity is expected in the short term, it is anticipated that the WSA would eventually reach full development. Therefore, wilderness values of naturalness and solitude would be lost in the long term on the entire 85,710 acres of the Adobe Town WSA.

Sights and sounds from recreational ORV use would have an adverse impact on the wilderness value of solitude, but the impact would be minimal because ORV use levels are low. Presently, ORV use is estimated to be 200 visitor days annually and is expected to remain below 300 visitor days annually for the foreseeable future.

Other recreation uses would increase slightly but would remain at levels below 1,000 visitor days annually for the foreseeable future. This increase would not significantly affect opportunities for solitude.

Conclusion: Adobe Town's wilderness values of naturalness and solitude would be essentially lost on the entire 85,710 acres because of oil and gas development. Recreational ORV use in the WSA would not significantly affect the WSA's opportunities for solitude.

Impacts on Recreational Off-Road Vehicle Use

Under this alternative, recreational ORV use would be limited to designated roads and trails in the entire WSA, once it is released from wilderness study. ORV use in the WSA is expected to remain below 300 visitor days annually in the foreseeable future.

Conclusion: While more of the WSA would be accessible, ORV use is projected to remain below 300 visitor days in the foreseeable future. There would be no significant impact to recreational ORV use.

Impacts on Cultural Resources

Oil and gas development is expected to physically disturb 9,075 acres within the 85,710 acre WSA, under the No Wilderness Alternative. Cultural resource surveys would be required on the disturbed acreage, resulting in inventory and evaluation of 425 cultural resource sites. This represents about 11% of the estimated total number of sites in the WSA. Inventory and evaluation of these sites would enhance knowledge about the pattern of past human activity in the WSA. However, these sites would necessarily be destroyed in the process of salvaging them prior to surface disturbance. In so doing, features that may not be important today, but could be extremely valuable in the future, would be lost. This also eliminates any of these sites from being preserved in place for future study. Sites on 76,635 acres would remain largely undisturbed for future study.

Conclusion: An estimated 425 cultural resource sites would be evaluated under the No Wilderness Alternative. This would provide important information regarding human activity in the WSA, but the sites would necessarily be destroyed and there would be no opportunity for preservation of these sites. Sites on 76,635 acres would remain largely undisturbed for future study.

Impacts on Livestock Grazing

There would be no adverse impacts on livestock grazing under this alternative. There would continue to be 5,068 AUMs available in the WSA. Surface disturbance would result in a loss of less than 1% of the total AUMs in the allotments containing the WSA. Continued oil and gas exploration and development would result in improved year-round motor vehicle access and would facilitate yearlong grazing of livestock. Maintenance of existing range improvements would be facilitated by this alternative.

Conclusion: The WSA would continue to provide 5,068 AUMs. There would be improved year-round motor vehicle access which would facilitate yearlong grazing of livestock.

ENVIRONMENTAL CONSEQUENCES

Impacts on Energy and Minerals

All lands within the Adobe Town WSA (85,710 acres) would be open to oil and gas leasing. Oil and gas development is not expected to occur, however, on areas exceeding 25% slope or within 500 feet of surface water and riparian areas because of the impracticality of developing in these areas. Thus, 15% of the gas within the Adobe Town WSA would not be recoverable under the No Wilderness Alternative while 85% of the gas would be recoverable. This is estimated to be 850 billion cubic feet (bcf) of gas and represents the maximum recoverable gas in the Adobe Town WSA.

Conclusion: The No Wilderness Alternative would allow for the maximum recovery of gas (85% or 850 bcf) in the Adobe Town WSA.

Impacts on Paleontological Resources

Under the No Wilderness Alternative, development of natural gas in the entire 85,710 acres of the WSA would result in about 9,075 acres of surface disturbance due to drill pads, roads, and pipelines. Except for obvious features such as bones, paleontological resources are not easily recognized by untrained individuals. Even though BLM requires that sites discovered during the course of work be reported to BLM, sites may be destroyed through the failure of the operator to recognize features as important paleontological remains. Therefore, paleontological resources on 9,075 acres could be destroyed without any knowledge of the sites' existence.

Conclusion: Destruction of paleontological resources would occur on 9,075 acres of the WSA due to development of oil and gas resources.

Impacts on Antelope and Mule Deer

Impacts on antelope and mule deer, under the No Wilderness Alternative, would be similar to those described under the Proposed Action, except that the possibility of concentrating mule deer within the WSA to avoid development activities would be eliminated. Displacement of animals to areas outside the WSA would be easily accommodated.

Conclusion: There would be no significant impacts to antelope and mule deer. Displacement of mule deer would be easily accommodated in areas adjacent to the WSA.

Impacts on Raptors

Because of the wide distribution of projected natural gas development, ferruginous hawk fledgling success rates would be expected to be between 25-30% throughout the entire Adobe Town WSA. With 22 active nests projected in the WSA, only five to six would produce fledglings. No data exist to indicate fledgling success rates for golden eagles and prairie falcons. It is assumed that success rates for these two species would decrease to an unknown level, but because they are more tolerant of human activity, the success rate would not drop as low as that for ferruginous hawks.

Conclusion: Between five and six active ferruginous hawk nests would produce fledglings (out of a total of 22) in the entire WSA. Fledgling success rates for golden eagles and prairie falcons would decrease to an unknown level, but would not drop as low as that for ferruginous hawks.

Partial Wilderness-2

Under the Partial Wilderness-2 Alternative, 16,280 acres of the Adobe Town WSA would be recommended for wilderness while the remaining 69,430 acres would be recommended for nonwilderness uses. The primary impacts under this alternative relate to oil and gas development and the resultant impacts on wilderness values.

Impacts on Wilderness Values

Wilderness values on the 16,280 acres recommended for wilderness would be protected by legislative mandate, except for 1,280 acres of existing pre-FLPMA leases within the partial wilderness boundary. The 1,280 acres of pre-FLPMA leases are physically capable of being developed and because of the valid existing rights, development thereon is expected. The end result is that the wilderness values of naturalness and solitude would be sustained on only 15,000 acres in the partial wilderness boundary, while naturalness and solitude would essentially be lost on 1,280 acres within the partial wilderness. Little activity is anticipated in the short term, but in the long term full development is expected so wilderness values would eventually suffer.

There would be no special legislative protection for wilderness values in the 69,430 acres recommended for nonwilderness under this alternative.

ENVIRONMENTAL CONSEQUENCES

Because of the anticipated development pattern, oil and gas activity (well spacing, roads, pipelines, and related facilities), wilderness values of naturalness and solitude would essentially be lost on the entire 69,430 acres. While little oil and gas activity is expected in the short term, it is anticipated that the area would eventually reach full development. Thus, wilderness values of naturalness and solitude would be lost in the long term on the 69,430 acres recommended for nonwilderness.

An estimated 50 visitor days annually of recreational ORV use would be eliminated from the wilderness portion of the WSA. Although encounters between ORV users and other recreationists are infrequent at current use levels, the elimination of ORV use would benefit the wilderness value of solitude because visitors would not encounter or hear ORV users in the area. Vehicle use on the 1,280 acres of pre-FLPMA leases within the partial wilderness boundary would be restricted to authorized (well operators and BLM inspectors) vehicles only. There would be no recreational ORV use in this 1,280-acre portion of the partial wilderness, and thus no impact from recreational ORV use to wilderness values.

Sights and sounds of ORV use in the nondesignated portion of the WSA would have an adverse impact on solitude. The impact would be minimal because ORV use is estimated to be less than 150 visitor days annually. Considering the impact of oil and gas development on wilderness values, the additional impacts due to recreational ORV use would be negligible.

Conclusion: Wilderness values of naturalness and solitude on 16,280 acres would be protected, except for 1,280 acres of existing pre-FLPMA leases. Anticipated oil and gas activity on the 69,430 acre nonwilderness portion of the WSA, and the 1,280 acres of pre-FLPMA leases would result in the loss of wilderness values on 70,710 acres in the long term. Impacts on wilderness values from either elimination or continuation of recreational ORV use would be negligible.

Impacts on Recreational Off-Road Vehicle Use

An estimated 50 visitor days annually of recreational ORV use would be eliminated from the 16,280 acres designated as wilderness under this alternative. Future opportunities would be forgone. However, there are similar or superior opportunities for recreational ORV use on public land throughout the region. Any ORV use displaced from this portion of the WSA upon designation would be absorbed on the surrounding public land.

Recreational ORV use on the 69,430 acre nonwilderness portion of the WSA is projected to remain below 200 visitor days annually for the foreseeable future. While 440 miles of new road is anticipated in conjunction with oil and gas development, recreational ORV use is not expected to increase dramatically, primarily because of the area's isolation.

Conclusion: Recreational ORV use is expected to remain below 200 visitor days annually in the 69,430 acres recommended for nonwilderness. Recreational ORV use of 50 visitor days annually would be eliminated from the 16,280 acres recommended for wilderness. The impact of this action on recreational ORV use in the Adobe Town WSA would be minimal because of similar or superior opportunities for ORV use on surrounding public land.

Impacts on Cultural Resources

Oil and gas development is expected to physically disturb 7,870 acres combined within the 69,430 acres of nonwilderness and the 1,280 acres of pre-FLPMA leases in the partial wilderness under this alternative. Cultural resource surveys would be required on the disturbed acreage resulting in inventory and evaluation of an estimated 370 cultural resource sites. This represents about 9% of the estimated total number of sites in the WSA. Inventory and evaluation of these sites would enhance knowledge about the pattern of past human activity in the WSA. However, these sites would necessarily be destroyed in the process of salvaging them prior to surface disturbance. In so doing, features that may not be important today, but could be extremely valuable in the future, would be lost. This also eliminates any of these sites from being preserved in place for future study.

In the 16,280 acres recommended for wilderness, no oil and gas activity or other surface disturbance would occur on 15,000 acres. Cultural resource sites on this 15,000 acres would remain largely undisturbed for future scientific study and interpretation of the resource values to the public.

Conclusion: Surface disturbance on 7,870 acres would result in the inventory and evaluation of about 9% of the WSA's cultural resource sites. This would enhance the knowledge about the pattern of past human activity in the WSA, but the sites would necessarily be destroyed, and there would be no opportunity for preservation of these sites. Cultural resource sites on the remaining 77,840 acres would remain largely undisturbed for future study.

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Impacts on Livestock Grazing

The Partial Wilderness-2 Alternative would not result in the removal or reduction in the number of livestock utilizing the WSA. Maintenance and construction of range improvements would continue as long as that activity did not impair wilderness values.

In general, motor vehicle access would only be allowed in emergencies and on special occasions, not for feeding, moving, or checking livestock. In the part of the WSA not recommended for wilderness designation, there would be no restrictions.

Impacts on livestock grazing would be minimal in the portion of the WSA recommended for wilderness under this alternative. That portion of the Rock Springs Grazing Association Allotment within the partial wilderness boundary is not normally grazed by domestic sheep in the winter because of the area's isolation. The Cow Creek Allotment is summer range so vehicle use is not critical to efficient and safe use of the allotment. None of the Adobe Town Allotment lies within the partial wilderness boundary. A small part of the Willow Creek Allotment lies within the partial wilderness boundary, but its isolation makes it use impractical under any designation.

There would be no impacts on livestock grazing in the area recommended for nonwilderness under this alternative. Surface disturbance would result in a loss of less than 1% of the total AUMs in the allotments containing the WSA.

Conclusion: There would be minimal impacts on livestock grazing within the partial wilderness boundary. There would be no reduction of livestock, and the partial wilderness' isolation limits its utilization in winter under any designation. There would be no impacts on livestock grazing in the nonwilderness portion of the WSA.

Impacts on Energy and Mineral Development

The 69,430 acres of the WSA recommended for nonwilderness would be open to oil and gas leasing. In addition, 1,280 acres of pre-FLPMA leases within the partial wilderness under this alternative would be open to development. This alternative would allow for 183 wells and recovery of 72% of the gas (720 bcf) within the Adobe Town WSA.

There would be no oil and gas development on the remaining 15,000 acres within the partial wilderness boundary. In the nonwilderness portions where the slope exceeds 25% and which lie within 500 feet of surface water and riparian areas, no development would occur unless an approved

plan of development could show that there would be no significant impacts on other resource values. Thus, 28% of the gas within the WSA would be unrecoverable under this alternative.

Conclusion: This alternative would allow for recovery of 72% (720 bcf) of the gas on 70,710 acres within the Adobe Town WSA.

Impacts on Paleontological Resources

Development of natural gas in the 69,430 acres recommended for nonwilderness uses and the 1,280 acres of pre-FLPMA leases in the wilderness portion would result in about 7,870 acres of surface disturbance due to drill pads, roads, and pipelines. Except for obvious features such as bones, paleontological resources are not easily recognized by untrained individuals. Even though BLM requires that sites discovered during the course of work be reported to BLM, sites are likely to be destroyed through the failure of the operator to recognize features as important paleontological remains. Therefore, paleontological resources on 7,870 acres could be destroyed without any knowledge of the sites' existence. Conversely, paleontological resources on 77,840 acres would remain undisturbed and would be available for scientific study.

Conclusion: Destruction of paleontological resources would occur on 7,870 acres of the nonwilderness portion due to development of oil and gas resources. Paleontological resources would remain largely undisturbed on 77,840 acres because there would be no surface disturbance from oil and gas activities.

Impacts on Antelope and Mule Deer

Impacts on antelope and mule deer would be similar to those described under the Proposed Action. Antelope would habituate to increased human activity and would be essentially unaffected. Mule deer would be displaced from the nonwilderness portion (69,430 acres) into the wilderness portion (16,280 acres) or to areas outside the WSA. These areas could easily accommodate the displaced animals.

Conclusion: There would be no significant impacts on antelope or mule deer. Displacement of mule deer would be easily accommodated.

Impacts on Raptors

Impacts on raptors would be similar to those described under the Proposed Action, except that naturally occurring fledgling success rates would

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occur on 16,280 acres within the area recommended for wilderness. There are projected to be four active ferruginous hawk nests in the suitable portion of the WSA; therefore, two nests would produce fledglings. On the nonwilderness portion, ferruginous hawk fledgling success rates would be expected to decrease to 25-30%. Of the 18 active nests projected to be in this portion of the WSA, only four to five would produce fledglings.

No data exist to indicate fledgling success rates for golden eagles or prairie falcons. It is known, however, that these two species are more tolerant of human disturbance than are ferruginous hawks. Thus, in the 16,280 acres recommended for wilderness, golden eagle and prairie falcon fledgling success rates would be those occurring naturally. In the nonwilderness portion, fledgling success rates for golden eagles and prairie falcons would decrease at an unknown rate, but would probably not decrease to the same degree as for ferruginous hawks.

Conclusion: Under the Partial Wilderness-2 Alternative, between four and five active ferruginous hawk nests (out of a total of 22) would produce fledglings. Fledgling success rates for golden eagles and prairie falcons would remain the same in the 16,280 acres recommended for wilderness. In the 69,430 acres of nonwilderness, fledgling success rates for these two species would decrease to an unknown level, but would probably not decrease to the same degree as for ferruginous hawks.

All Wilderness

Under this alternative, the entire 85,710 acres of Adobe Town would be recommended for wilderness designation. The primary impacts here relate to oil and gas development on pre-FLPMA leases and the resultant impacts on wilderness values.

Impacts on Wilderness Values

Wilderness values on 85,710 acres of the WSA would be given the special legislative protection afforded to designated wilderness, except for 39,300 acres of pre-FLPMA leases within the WSA. These 39,300 acres would be open to oil and gas leasing and development because of the valid existing rights of pre-FLPMA oil and gas leases. Because of the spacing of wells, roads, and pipeline network, and related facilities, wilderness values would essentially be lost on 39,300 acres of designated wilderness under this alternative.

While little oil and gas activity is expected in the short term, it is expected that the area would eventually reach full development. Thus, wilderness values of naturalness and solitude would be lost in the long term on 39,300 acres.

An estimated 200 visitor days annually of recreational ORV use would be eliminated from the WSA. While there would be 215 miles of new road associated with oil and gas development, these would be open to authorized vehicles (well operators and BLM inspectors) only. Thus, there would be no increase in recreational ORV use because of new roads. Although encounters between recreational ORV users and other recreationists are infrequent at current use levels, the elimination of ORV use would benefit the wilderness value of solitude because visitors would not encounter or hear ORV users in the WSA.

Conclusion: Under the All Wilderness Alternative, wilderness values would be protected only on 46,410 acres. Wilderness values would essentially be lost on 39,300 acres of pre-FLPMA leases in a designated wilderness. While elimination of recreational ORV use would enhance opportunities for solitude, oil and gas activity on pre-FLPMA leases would make this beneficial impact negligible on 39,300 acres.

Impacts on Recreational Off-Road Vehicle Use

An estimated 200 visitor days annually of ORV use would be eliminated from the entire WSA. Future opportunities would be forgone. However, there are similar or superior opportunities for ORV use on public land throughout the region. Any ORV use displaced from the WSA would be absorbed on the surrounding public land.

Conclusion: Recreational ORV use of 200 visitor days annually would be forgone; the impacts of displacing this use to other nonwilderness public land would be negligible.

Impacts on Cultural Resources

Oil and gas activity is expected to physically disturb 3,750 acres within the 39,300 acres of pre-FLPMA leases under this alternative. Cultural resource surveys would be required on the disturbed acreage, resulting in inventory and evaluation of an estimated 175 cultural resource sites. This is about 4% of the estimated total number of sites in the WSA. Inventory and evaluation of these sites would enhance knowledge about the pattern of past human activity in the WSA.

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However, these sites would necessarily be destroyed in the process of salvaging them prior to surface disturbance. In so doing, features that may not be important today, but could be extremely valuable in the future, would be lost. This also eliminates any of these sites from being preserved in place for future study. Sites on 35,550 acres would remain largely undisturbed for future study.

In the remaining 46,410, no oil and gas activities or other surface disturbance would occur. Cultural resource sites would remain largely undisturbed for future scientific study and interpretation of the resource values to the public.

Conclusion: Oil and gas activity on 39,300 acres of pre-FLPMA leases would disturb 3,750 acres. Cultural resource surveys on these 3,750 acres would result in the inventory and evaluation of about 4% of the WSA's cultural resource sites. While enhancing the knowledge about the pattern of past human activity in the WSA, the sites would necessarily be destroyed and there would be no opportunity to preserve these sites. Cultural resource sites would remain largely undisturbed for future study on 81,960 acres.

Impacts on Livestock Grazing

The WSA would continue to provide 5,068 AUMs. Existing range improvements could be maintained and new ones could be constructed, as long as they conformed with the Wilderness Management Policy. None are currently planned for the area. Motor vehicle access would not be allowed.

Wilderness designation would make the operators' management of livestock in the WSA more difficult. While they could monitor their sheep by horseback and move their sheep wagons by horse in the WSA, this becomes much more difficult and risky in the winter than if it were done with a motorized vehicle. The result may be that the livestock operator may choose to take voluntary nonuse of the WSA. This could affect up to 3,893 AUMs or 4% of the total AUMs in the Rock Springs Grazing Association Allotment and the Willow Creek Allotment. Motor vehicle access in the Cow Creek Allotment is not that critical because it is summer range. Very little of the Adobe Town Allotment is in the WSA and what is in the WSA is easily accessible by a road along the WSA's eastern boundary. The added difficulty would only be manifested in the Rock Springs Grazing Association Allotment and the Willow Creek Allotment.

Conclusion: Designation of the entire Adobe Town WSA (85,710 acres) would make management of livestock by the operators more difficult by eliminating vehicle use. This could result in operators taking voluntary nonuse of 3,893 AUMs in the Rock Springs Grazing Association Allotment and the Willow Creek Allotment. The Adobe Town Allotment and the Cow Creek Allotment would be unaffected by this action.

Impacts on Energy and Mineral Development

Under the All Wilderness Alternative, 39,300 acres of existing pre-FLPMA leases would be open for oil and gas development. Given constraints due to steep slopes, surface water, and riparian areas, this would result in about 89 wells recovering 35% of the gas within the Adobe Town WSA. There would be no oil and gas development on the remaining 46,410 acres of the WSA. Thus, 65% of the gas in the Adobe Town WSA would be unrecoverable under this alternative. Table 6 illustrates the comparative summary of the amount of natural gas recoverable under each of the four alternatives.

Conclusion: The All Wilderness Alternative would allow for the recovery of 35% of the gas within the Adobe Town WSA.

TABLE 6
COMPARATIVE SUMMARY
OF THE ALTERNATIVES

Alternative	Percent of Gas Recoverable
Proposed Action ¹ (Partial Wilderness)	80
No Wilderness ²	85
All Wilderness ³	35
Partial Wilderness-2 ⁴	72

¹ Includes most of the area that is impractical to develop

² Not 100% gas recovery because of areas of steep slopes, drainages, inaccessibility

³ Assumes development on 37,790 acres of pre-FLPMA leases except in areas of steep slopes, drainage, and inaccessibility

⁴ Assumes development on 1,280 acres of pre-FLPMA leases

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Impacts on Paleontological Resources

Development of natural gas in the 39,300 acres of pre-FLPMA leases would result in about 3,750 acres of surface disturbance due to drill pads, roads, and pipelines. Except for obvious features such as bones, paleontological resources are not easily recognized by untrained individuals. Even though BLM requires that sites discovered during the course of work be reported to BLM, sites are likely to be destroyed through the failure of the operator to recognize features as important paleontological remains. Therefore, paleontological resources on 3,750 acres could be destroyed without any knowledge of the sites' existence. Conversely, paleontological resources on the remaining acres would remain undisturbed and would be available for scientific study.

Conclusion: Destruction of paleontological resources would occur on 3,750 acres due to development of oil and gas resources. Paleontological resources would remain largely undisturbed on the remaining acres because there would be no surface disturbance from oil and gas activities.

Impacts on Antelope and Mule Deer

Under the All Wilderness Alternative, surface disturbance would be significantly reduced. As a result, there would be no impacts on antelope. The developments would be sufficiently spread out so that little, if any, displacement of mule deer would occur.

Conclusion: There would be no significant impacts on antelope and mule deer. Antelope would not be affected. Little, if any, displacement of mule deer would occur.

Impacts on Raptors

Under the All Wilderness Alternative, decreased fledgling success rates would occur only in the 39,300 acres of pre-FLPMA leases on which development is expected. Because development would be somewhat less concentrated than in nonwilderness, fledgling success for ferruginous hawks would be expected to be about 35-40%. There are projected to be 12 active ferruginous hawk nests in the 39,300 acres of pre-FLPMA lease. Therefore, between four and five would produce fledglings. Success rates of ferruginous hawks in the remainder of the WSA (46,410 acres) would be between 45-55%. Here, of the 10 nests projected to be in the area, about five would produce fledglings.

No data exist to indicate fledgling success rates for golden eagles or prairie falcons. Because these two species are more tolerant of human activity than are ferruginous hawks, and because development would be somewhat less concentrated, very little decrease in fledgling success rates would be expected in the 39,300 acres of pre-FLPMA leases. No change in success rates would be expected in the remainder of the WSA (46,410 acres).

Conclusion: Under the All Wilderness alternative, nine to ten active ferruginous hawk nests (out of 22 total) would produce fledglings. Success rates for golden eagles and prairie falcons would remain essentially unchanged from that normally found in nature.

FERRIS MOUNTAINS

Proposed Action (All Wilderness)

Under the Proposed Action, the entire Ferris Mountains WSA (22,245 acres) would be recommended for wilderness designation. The primary impacts of this action relate to wilderness designation and the resultant forgone opportunities for mineral development and timber harvest.

Impacts on Wilderness Values

Wilderness values on 22,245 acres (the entire WSA) would be given the special legislative protection afforded to designated wilderness. No timber harvesting would occur. The entire area would be withdrawn from all forms of mineral entry and leasing. Current uses of the 160-acre private inholding in the WSA are compatible with wilderness and are not projected to change. Therefore, there would be no adverse effects to wilderness values adjacent to the inholding.

The 600 acres of prescribed burns would have the appearance of natural fire in the short term, and would be essentially unnoticeable in the long term. As a result, the prescribed burns would not adversely affect wilderness values.

An estimated 10 visitor days annually of recreational ORV use would be eliminated by wilderness designation. Although encounters between ORV users and other recreationists are infrequent at current levels of use, the elimination of ORVs would benefit the wilderness value of solitude because visitors would not encounter or hear ORV users in the area. Beneficial impacts on naturalness would be negligible because current use levels are low.

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Conclusion: Wilderness values of naturalness and solitude would be protected on the entire 22,245-acre Ferris Mountains WSA.

Impacts on Recreational Off-Road Vehicle Use

An estimated 10 visitor days annually of recreational ORV use would be eliminated from the entire 22,245 acres of the WSA. Future opportunities would be forgone. However, there are similar or superior opportunities for ORV use on public land throughout the region. Any ORV use displaced from the WSA upon wilderness designation would be absorbed with no consequence on surrounding public land.

Conclusion: Recreational ORV use of 10 visitor days annually would be forgone; the impacts of displacing this use to other nonwilderness public land would be negligible.

Impacts on Forest Management Actions

By designating the WSA as wilderness, post and pole harvest opportunities on 1,000 acres of commercial timber would be forgone. Approximate harvest of 8 MMBF over the next 50 to 100 years would be forgone. There are no timber sales planned in the WSA in the near future, so there would be no short term effects on timber harvesting due to wilderness designation.

Conclusion: Wilderness designation would forgo timber harvest of 8 MMBF over the next 50 to 100 years. No timber sales are planned in the WSA in the near future, so there would be no short-term impacts due to wilderness designation.

Impacts on Energy and Mineral Development

The entire WSA would be withdrawn from mineral leasing. No interest has been shown in drilling within the WSA, and it has been identified as having low potential. Future opportunities to explore for oil and gas resources on 22,245 acres would be forgone.

The entire area would be withdrawn from mineral entry. Prior to commencing work on the existing claims in the WSA, a validity examination must show that the claims hold sufficient quantity and quality of material so that a prudent man could expect a reasonable return on his investment. For purposes of analysis, it is assumed that the existing claims within the WSA would not pass a validity examination and thus, could not be developed.

Conclusion: Opportunities to explore for and develop potential locatable mineral deposits would be forgone. However, there is low potential for locatable minerals, so no production would be forgone. There would be no oil and gas development activities.

Impacts on Elk and Bighorn Sheep

There would be no surface disturbance on 22,245 acres under the Proposed Action. Exclusion of activities such as road building and timber harvest would help ensure long-term preservation of elk and bighorn sheep habitat throughout the WSA. Prescribed burns would improve forage quality on 600 acres of bighorn sheep habitat. This could double the number of animals utilizing the WSA to 120.

Conclusion: Exclusion of roads and timber harvests would help ensure long-term protection of elk and bighorn sheep habitat on 22,245 acres. The sheep population in the WSA is expected to double from 60 to 120.

Impacts on Raptors

The Proposed Action would provide long-term protection of nesting habitat for raptors. Nest failure rates for golden eagles, prairie falcons, and other raptors would be that typically expected for a relatively undisturbed area.

Conclusion: Long-term protection of nesting habitat would be provided on 22,245 acres of the Ferris Mountains WSA.

No Wilderness/No Action Alternative

Under this alternative, the entire 22,245 acres of the WSA would be recommended for nonwilderness uses. The primary impacts under this alternative relate to timber harvest and the resultant impacts on wilderness values.

Impacts on Wilderness Values

The entire WSA would be recommended non-suitable for wilderness designation and none of the wilderness values on 22,245 acres would receive the special legislative protection provided by wilderness designation. In the long term, harvest of 8 MMBF of commercial timber over the next 50 to 100 years would adversely affect wilderness values.

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Impacts on Recreational Off-Road Vehicle Use

As a result of the ORV closure, an estimated 10 visitor days annually of recreational ORV use would be eliminated from the entire 22,245 acres of the WSA. The 7.5 miles of new road associated with timber harvest would not be accessible to recreational ORV users. There would be no increase in accessibility.

Conclusion: There would be no increase in accessibility in the WSA. Recreational ORV use of 10 visitor days annually would be forgone. There would be no significant impacts on recreational ORV use.

Impacts on Forest Management Actions

With this alternative, 8 MMBF of primarily post and pole commercial timber on 1,000 acres would be harvested in the next 50 to 100 years. Other intensive forest management activities could occur on the remaining 8,000 acres of forested land in the WSA. The forested land would be managed to produce a sustained yield over the long term.

Conclusion: Timber harvest on 1,000 acres would occur under this alternative, resulting in 8 MMBF of posts and poles cut over the next 50 to 100 years. No sales are planned in the short term. Other forest management practices could occur in the WSA.

Impacts on Energy and Mineral Development

The entire Ferris Mountains WSA (22,245 acres) would be open to mineral entry and leasing. All of the WSA would be available for oil and gas exploration and development, except for areas in excess of 25% slope or within 500 feet of surface water and riparian areas. However, no interest has been shown in drilling within the WSA and the area has low potential, so no activity is expected.

All 22,245 acres of the WSA would be open to locatable mineral entry. Assessment work on the existing lode claims would continue. However, there is a low potential for locatable minerals in the WSA, so no development of these claims is expected.

Conclusion: Potential energy and mineral resources would be available for development. There is low potential for such resources in the WSA so no development is expected.

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Impacts on Elk and Bighorn Sheep

Under the No Wilderness Alternative, timber harvesting would occur. Small quantities of habitat would be lost until disturbed areas were reclaimed or harvest activities ended. However, because harvests would not occur while the animals are on their crucial winter ranges, and because roads built would be used only for harvest activities, there would be no significant impacts to either of these species. Prescribed burns would improve forage quality on 600 acres of bighorn sheep habitat, thus doubling the number of sheep utilizing the WSA to 120.

Conclusion: About 600 acres of bighorn sheep habitat would be improved by burning, thus doubling the sheep population in the WSA.

Impacts on Raptors

Under the No Wilderness Alternative, timber harvesting would occur, but would not be allowed during the raptors' nesting periods. Stipulation 2b. (see Appendix) would be applied to all timber sales to protect nesting raptors. As a result, raptors would not be significantly affected. Additionally, new roads built for timber harvest activities would not be open to the general public. There would be no increase in vehicle traffic and thus, no impact to raptors. A natural nest failure rate for golden eagles, prairie falcons, and other raptors would be expected.

Conclusion: Because of restrictions to timber harvesting during nesting periods, there would be no significant impacts to raptors under the No Wilderness Alternative.

Enhanced Wilderness Alternative

With this alternative, the entire 22,245 acres of the WSA would be recommended for wilderness. Additionally, 1,800 acres of adjacent state and private lands would be proposed for acquisition through exchange or purchase and incorporated into the designated wilderness. The primary impacts here relate to forgone opportunities for mineral development and timber harvest and the enhancement of wilderness values on a larger acreage.

Impacts on Wilderness Values

Wilderness values on 24,045 acres (the entire WSA and added acreage) would be given the special legislative protection provided by wilderness

designation. No timber harvesting would occur. The entire area would be withdrawn from all forms of mineral entry and leasing.

Current uses of the 160-acre private inholding and the 1,640 acres of state and private land identified for inclusion are compatible with wilderness and are not projected to change. Therefore, while there are no anticipated beneficial impacts on wilderness values from including an additional 1,800 acres into the designated wilderness, official designation would be the only method to assure that wilderness values on the additional acreage would be maintained in the long term.

The 600 acres of prescribed burns would have the appearance of natural fire in the short term, and would be essentially unnoticeable in the long term. As a result, the prescribed burns would not adversely affect wilderness values.

An estimated 10 visitor days annually of recreational ORV use would be eliminated by wilderness designation. Although encounters between ORV users and other recreationists are infrequent at current levels of use, the elimination of ORVs would benefit the wilderness value of solitude because visitors would not encounter or hear ORV users in the area. Beneficial impacts on naturalness would be negligible because current use levels are low.

Conclusion: Wilderness values of naturalness and solitude would be protected on 24,045-acres of the expanded wilderness.

Impacts on Recreational Off-Road Vehicle Use

An estimated 10 visitor days annually of recreational ORV use would be eliminated from the expanded 24,045-acre WSA. Future opportunities would be forgone. However, there are similar or superior opportunities for ORV use on public land throughout the region. Any ORV use displaced from the WSA upon wilderness designation would be absorbed with no consequence on surrounding public land.

Conclusion: Recreational ORV use of 10 visitor days annually would be forgone; the impact of displacing this use to other nonwilderness public land would be negligible.

Impacts on Forest Management Actions

By designating the WSA as wilderness, timber harvest opportunities on 1,000 acres of commercial timber would be forgone. Approximate harvest of 8 MMBF of posts and poles over the next

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50 to 100 years would be forgone. There are no timber sales planned in the WSA, so there would be no short term effects on timber harvesting due to wilderness designation.

Conclusion: Wilderness designation of the expanded area (24,045 acres) would forgo timber harvest of 8 MMBF over the next 50 to 100 years. No timber sales are planned in the near future in the WSA, so there would be no short-term impacts due to wilderness designation.

Impacts on Energy and Mineral Development

The entire expanded WSA would be withdrawn from mineral leasing. No interest has been shown in drilling within the WSA, and it has been identified as having low potential. Future opportunities to explore for and develop oil and gas resources on 24,045 acres would be forgone.

The entire area would be withdrawn from mineral entry. Prior to commencing work on the existing claims in the WSA, a validity examination must show that the claims hold sufficient quantity and quality of material so that a prudent man could expect a reasonable return on his investment. For purposes of analysis, it is assumed that the existing claims within the WSA would not pass a validity examination and thus, could not be developed. Other, as yet, undiscovered energy and mineral resources could not be developed.

Conclusion: Opportunities to explore for and develop potential locatable mineral deposits would be forgone. However, there is low potential for locatable minerals, so no production would be forgone. There would be no oil and gas development activities.

Impacts on Elk and Bighorn Sheep

Impacts on elk and bighorn sheep under the Enhanced Wilderness Alternative would be the same to those described for the Proposed Action, except that long-term preservation of habitat would occur on 24,045 acres. Because this alternative would ensure that development activities would be excluded on the expanded acreage (none are planned), additional elk and bighorn sheep habitat would be preserved in the long

term. Prescribed burns would improve forage quality on 600 acres of bighorn sheep habitat, thus doubling the number of sheep utilizing the WSA to 120.

Conclusion: Long-term preservation of elk and bighorn sheep habitat would occur on 24,045 acres. About 600 acres of bighorn sheep habitat would be improved by burning, thus doubling the sheep population in the WSA.

Impacts on Raptors

Under the Enhanced Wilderness Alternative, impacts on raptors would be similar to those described under the Proposed Action, except that long-term protection of nesting habitat would be increased to a total of 24,045 acres. Naturally occurring nest failure rates for golden eagles, prairie falcons, and other raptors would be expected.

Conclusion: Long-term protection of raptor nesting habitat would be increased to 24,045 acres under the Enhanced Wilderness Alternative.

RELATIONSHIP BETWEEN SHORT-TERM USE OF THE ENVIRONMENT AND THE MAINTENANCE AND ENHANCEMENT OF LONG-TERM PRODUCTIVITY

If a WSA is not designated wilderness, all present, short-term uses would continue. Off-road vehicle use, timber harvest, mining, and mineral leasing activities would result in the loss of wilderness values over the long term.

If an area is designated wilderness, it would ensure the long-term productivity of ecosystems and would maintain or enhance present wilderness values. Motorized vehicles could no longer be used except where prescribed by an area's wilderness management plan. Mineral resources would not be available for development after the date of designation, subject to a validity examination.

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IRREVERSIBLE AND IRRETRIEVABLE COMMITMENT OF RESOURCES

Activities such as mining, mineral leasing, and material sales could create an irreversible commitment of the wilderness resource in part or all of

a WSA, if not designated as wilderness. Wilderness designation would not create an irretrievable or irreversible commitment of resources within a WSA. Designation would restrict or stop development activities and maintain an area's natural condition. If, in the future, Congress decided it would be in the national interest to develop certain resources within a wilderness, they can modify the law to allow it.

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CHAPTER 5

CONSULTATION AND COORDINATION

INTRODUCTION

The Adobe Town/Ferris Mountains Wilderness Final Environmental Impact Statement (FEIS) was prepared by specialists from BLM's Rawlins District Office, with assistance from the Wyoming State Office. Disciplines and skills used to develop this EIS were: vegetation and range use, soils, recreation, geology, climate, economics, cultural resources, public affairs, wildlife, and word processing. The writing of the EIS began in July 1982; research began in 1978 with the wilderness review required by FLPMA. The process included inventories of resources, public participation, and coordination with other agencies, organizations, and individuals. Care has been exercised to ensure that the public was consulted and informed throughout the wilderness review process.

An active public involvement process aided in developing this EIS. Public opinion was elicited through a public meeting in Rawlins, mailings to an extensive list of groups and individuals, personal interviews, and a notice in the *Federal Register*.

List of Preparers

Jim Annable

Qualifications: Petroleum Engineer, Bureau of Land Management, 3 years; AMOCO Production Company, 2 years; B.S. Geological Engineering, South Dakota School of Mines and Technology.

Responsibility: Oil and Gas Resources

Michael Bies

Qualifications: Archaeologist, Bureau of Land Management, 3 years; Archaeologist, U.S. Forest Service, 1½ years; Archaeologist, Historical Archaeologist, Historian, Contract Cultural Resource Management, private industry and various federal agencies (Oregon, Washington, Idaho, and Montana), 3 years; M.A. in progress, Anthropology, University of Idaho, Moscow; B.S. History and Sociology/Anthropology, University of South Dakota, Vermillion.

Responsibility: Cultural Resources

Tim Bottomley

Qualifications: Forester, Bureau of Land Management, 8 years; B.S. Forest Management, University of Illinois.

Responsibility: Forest Resources

Larry Claypool

Qualifications: Petroleum Engineer, Bureau of Land Management, 3 years; B.S., Petroleum Engineering, University of Wyoming.

Responsibility: Oil and Gas Resources

Rick Colvin

Qualifications: Outdoor Recreation Planner, Bureau of Land Management, 7 years; B.S., Resource Recreation Management, Oregon State University; M.A., Interdisciplinary Studies, Oregon State University.

Responsibility: Team Leader for final EIS; overall direction and management.

Jim Farrell

Qualifications: Wildlife Biologist, Bureau of Land Management, 7 years; Soil Conservation Service, ½ year; B.S., Range Management, Washington State University.

Responsibility: Wildlife Resources, Adobe Town WSA

Bob Janssen

Qualifications: Geologist, Bureau of Land Management, 8 years; M.S., Geology, Colorado State University, B.S., Earth Science/Regional Analysis, University of Wisconsin.

Responsibility: Geologic Resources, Technical Coordinator on final EIS

Gary Long

Qualifications: Outdoor Recreation Planner, 5 years, Land Use Planner (Economist), 4 years, Bureau of Land Management; Research Assistant, University of Wyoming, 1 year; B.A. Geography, University of Wyoming.

Responsibilities: Technical Coordinator on draft EIS

CONSULTATION AND COORDINATION

Vernon Lovejoy

Qualifications: Outdoor Recreation Planner, Bureau of Land Management, 10 years; Realty Specialist, Army Corps of Engineers, 3 years; B.A., Geography, University of Charleston, W. VA.; M.S. Recreation and Park Administration, Eastern Kentucky University.

Responsibilities: Recreation and Wilderness Resources

Jan Macey

Qualification: Clerk-typist, Bureau of Land Management, 3 years; Computer Assistant, 1 year, Secretary 7 years, Bureau of Reclamation.

Responsibilities: Typing

Jeff Olson

Qualifications: Geologist, Bureau of Land Management, 2 years; B.S., University of Northern Colorado.

Responsibility: Oil and Gas Resources

Tom Rinkes

Qualification: Wildlife Biologist, Bureau of Land Management, 9 years; B.S., Wildlife Resources, University of Idaho.

Responsibility: Wildlife Resources, Ferris Mountains WSA

Bob Tigner

Qualifications: Natural Resource Specialist, Bureau of Land Management, 6 years, Wildlife Biologist (Research), U.S. Fish and Wildlife Service, 21 years; Ph.D., Biology, University of Colorado; M.S., B.S., Wildlife Management, Colorado State University.

Responsibility: Team Leader on draft EIS; overall direction and management.

Environmental Impact Statement Review

An intensive effort has been made to involve the public, other agencies, industry, and special interest groups. The draft EIS was released for public review and comment in June 1983. The formal comment period was open until September 30, 1983. Over 300 copies of the draft EIS were sent to interested parties. A public hearing was held July 26, 1983 in Rawlins, Wyoming. A total of five people testified at that hearing.

During the comment period, 46 written comments were received. Comments were received from 4 federal agencies, 12 State of Wyoming agencies, including the Governor's Office. Six

energy companies commented. Conservation organizations submitted 5 comments, and 20 comments were received from individuals.

All comments that presented new data, questioned facts or analysis, and raised issues having a direct bearing on the adequacy of the EIS were used in making changes to the draft and/or given individual responses in this chapter. Responses are also provided for other comments considered to be of general interest to the readers. All public comments will be considered when making the final wilderness recommendations, regardless of whether they are printed or receive responses in this EIS.

Reviewers and Responses

The following list identifies agencies, organizations, and individuals to whom copies of the draft EIS were sent. Those agencies, organizations, and individuals who returned written comments are denoted by a letter and page number. The comments for which responses were prepared are identified by vertical lines and consecutive numbers in the left margin of each letter. The corresponding responses are shown on the pages following each letter and are numbered to match the comments.

Elected Officials

Federal Officials and Agencies

Senator Malcolm Wallop
Senator Alan Simpson
Congressman Richard Cheney

Department of the Interior
Bureau of Reclamation
Bureau of Mines, Comment Letter 1
Fish and Wildlife Service, Comment Letter 2a, 2b
Geological Survey
Minerals Management Service
National Park Service, Comment Letter 3
Office of Surface Mining
Department of Agriculture
Forest Service
Soil Conservation Service
Department of Energy
Department of the Air Force
Environmental Protection Agency, Comment Letter 4

State Officials and Agencies

Governor Ed Herschler, Comment Letter 5
Senators
Win Hickey
David R. Nicholas
O. R. "Bud" Daily

CONSULTATION AND COORDINATION

State Officials and Agencies (con't)

Thomas E. Trowbridge
John P. Vinich
Wm. G. Rector
Dick Seder
Tom Stroock
Diemer True
Steve Majhanovich

Representatives

T. A. Larson
Patti MacMillan
Mary Odde
Scott Ratliff
Harry B. Tipton
Ken Burns
Harriet "Liz" Byrd
Elizabeth Phelan
Alvin Widerspahn
Nyle A. Murphy
Jack Sidi
Joe Stewart
James Roth
Eldon Spicer
Ann Strand

Wyoming Game and Fish Department, Comment Letter 8
Wyoming Highway Department
Wyoming State Historic Preservation
Office, Comment Letter 7,8
Wyoming Recreation Commission, Comment Letter 9
Wyoming Planning Commission
Geologic Survey of Wyoming, Comment Letter 10
Wyoming Department of Agriculture, Comment Letter 11,12
Wyoming Department of Environmental
Quality, Comment Letter 13
Wyoming Oil and Gas Conservation
Commission, Comment Letter 14
State Engineer's Office, Comment Letter 15
Commission of Public Lands & Farms
Loans, Comment Letter 16
University of Wyoming

Local

Mayor, Beggs
Mayor, Dixon
Mayor, Riverton
Mayor, Sinclair
Mayor, Wamsutter
Carbon County Planning Commission
Medicine Bow Town Council
Natrona County Commissioners
Sweetwater County Planning Department

Organizations

Continental Divide Trail Society, Comment Letter 17
Defenders of Wildlife
Friends of the Earth
Holy Cross Wilderness Defense Fund
League of Women Voters
National Audubon Society
National Mustang Association, Inc.
National Wildlife Federation
National Resources Defense Council
Rock Springs Grazing Association
Sierra Club, Comment Letter 18,19

American Wilderness Alliance
Isaac Walton League
Wild Horse Organized Assistance
The Wilderness Society, Comment Letter 20
Wyoming Heritage Society
Wyoming Heritage Foundation
Wyoming Outdoor Council, Comment Letter 21
Wyoming Mining Association
Wyoming Wilderness Federation
Wyoming Wool Growers Association
Wyoming Stockgrowers Association

Industry

AMOCO Production Company (USA)
Arch Mineral Corporation
Atlantic Richfield Company, Comment Letter 22
Big Eagle Mine
Bronco Exploration
Celsius Energy Company, Comment Letter 23
Champion Petroleum Company
Chevron USA, Inc., Comment Letter 24
Consolidation Coal
Cotton Petroleum Corporation
EXXON
PKS Mining
Koch Exploration Company
Koch Industries, Inc.
Marathon Oil Company
Minerals Exploration Company, Comment Letter 25
Mountain Fuel Supply Company
Northwest Central Pipeline Corporation
Paintbrush Petroleum Corporation
Pathfinder Mines Corporation
Pennzoil Company
Petroleum Association of Wyoming, Comment Letter 26
Rocky Mountain Oil and Gas Association
Rocky Mountain Energy
Shell Oil Company
Texaco
Texas Gas Corporation, Comment Letter 27
Texas Oil and Gas Corporation, Comment Letter
Upland Industries Corporation
Wold Nuclear Company

Individuals

District Mailing List (on file)
Anthony M. Rigano, Sr., Comment Letter 28
Larry DiBrito, Comment Letter 29
Gary Raymond, Comment Letter 30
Bob Giurgevich, Comment Letter 31
John Merrifield, Comment Letter 32
Bernard Sun, Comment Letter 33
Wm. McIntosh, Comment Letter 34
John R. Swanson, Comment Letter 35
P. W. Williamson, Comment Letter 36
Bert Koehler, Comment Letter 37
Ross Titus, Comment Letter 38
Allen L. Hammer, Comment Letter 39
Jesse L. Himmelsreich, Comment Letter 40
S. Henry Hall, Comment Letter 41
Norman Johnson, Comment Letter 42
Dick Wilson, Comment Letter 43
Milton L. Allen, Comment Letter 44
Martie Crone, Comment Letter 45
Reid Secord, Comment Letter 46
Ronald Hocking, Comment Letter 47

PUBLIC COMMENTS AND RESPONSES ON THE WILDERNESS DRAFT ENVIRONMENTAL IMPACT STATEMENT

Introduction

This section has been divided into two parts. Part one is the transcript of the public hearing conducted July 26, 1983, and responses. Part two consists of a total of 47 comment letters from individuals, private organizations, and federal, state and local agencies on their comments to the Adobe Town/Ferris Mountain Wilderness Draft Environmental Impact Statement.

Hearing Transcript and Responses

All public hearing responses immediately follow the transcript which is printed in its entirety.

Comment Letters and Responses

All comments are printed verbatim. A few hand-written comments have been typed verbatim for better readability and have been noted as such.

BEFORE THE BUREAU OF LAND MANAGEMENT DEPARTMENT OF INTERIOR	
1	IN THE MATTER OF A HEARING TO
2	DETERMINE IF THE WILDERNESS STUDY
3	AREA IS SUITABLE OR UNSUITABLE
4	FOR DESIGNATION AS WILDERNESS.
5	
6	TRANSCRIPT OF HEARING PROCEEDINGS
7	PURSUANT TO NOTICE duly given to all parties in
8	interest, this matter came on regularly for hearing in the
9	26th day of July, 1983, at the hour of 7:15 p.m., in the
10	hearing room of the Jeffrey Center, Third and Spruce, Rawlins,
11	Wyoming, before the Bureau of Land Management, Hearing Officer
12	Clay Corrad presiding; also present Gary Long, Bureau of Land
13	Management representative.
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PROCEEDINGS

(Hearing proceedings commenced at 7:15 p.m., July 21, 1983.)

HEARING OFFICER CONARD: Good evening, ladies

and gentlemen. This public hearing will now come to order.

First, let me introduce myself. I am Chet Conard with the Bureau of Land Management in Worland. I have been appointed by the State Director of the Bureau of Land Management to conduct this public hearing under the authority of the Secretary of the Interior concerning the wilderness study of the Rawlins District, encompassing the divide in the Medicine Bow resource areas.

Most of you undoubtedly signed the attendance sheet as you came into the room. If you have not done so, I would like to ask that you sign it now. If you plan to make a statement, be sure to check the appropriate space on the attendance sheet so that we can add your name to the list of speakers.

The official reporter will prepare a verbatim transcript of everything that is said in this hearing. If you wish to obtain a copy of this transcript, you should make your arrangements with the reporter, Lori Arnold, here to my left.

This public hearing is being held to obtain information relative to three wilderness study areas, which have been studied by the Bureau of Land Management. A Draft

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whether or not it is pertinent. This may seem overly formal, but it is intended to give everyone a fair and reasonable opportunity to present their views.

When I have finished my opening statement, I will call on the Bureau of Land Management representative to explain their proposed actions and alternatives. The presentation should take about 15 minutes. In view of these number of speakers that have signed up, which is three, I don't believe it's necessary to at this time limit their presentation, so I will make that designation later if it's necessary. If you cannot express all of your comments and I have to cut you off, you may submit further comments in writing. Any written statements submitted will be included in the full transcript and will be considered on the same basis as the oral comments. You may also submit written comments until October 6, 1983, and those also will be included in the hearing record and considered fully. Any comments should be addressed to: District Manager, Bureau of Land Management, P. O. Box 670, Rawlins, Wyoming, 82301.

The Federal Land Policy and Management Act of 1976, commonly known as FLPMA, directed the BLM to conduct a wilderness review of certain public lands. The wilderness study area under consideration here were identified by the BLM under criteria set forth in section 2(c) of the Wilderness Act. The act directed the BLM to review such areas and prepare

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1. Recreation Planner of the Bureau of Land Management to explain the preliminary findings of the wilderness study to you.

2. Mr. Gary Long.

MR. LONG: The BLM's wilderness study was guided by a published document referred to as the Bureau of Land Management Wilderness Study Policy, which has been circulated and is available for review in our district office if anyone is interested in obtaining a copy.

What a wilderness study consists of is applying evaluation criteria and quality standards on each of these two wilderness study areas to determine if they are either suitable or non-suitable for designation as wilderness.

The evaluation criteria, and there were two, are as follows: The first is simply an evaluation of a wilderness study area as wilderness characteristics to simply determine how good the area is. The second and equally important is to determine if the area is actually manageable as wilderness.

The quality standards consist of us looking at the following: Number one is a consideration of energy and mineral resource values that might be in the area. Number two is the impact on other resources were we to designate one if the area as wilderness. Number three is the impacts of non-designation on wilderness values in the area. In other words, what would happen to the wilderness values of the study area if it were not designated as wilderness. Number four is a thorough review

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multiple use management type format, this sort of thing.

So for Adobe Town, the proposed action is non-wilderness designation. But with what we have referred to as Intensive Resource Management. In other words, that would consist of a designation of that area under our off-road vehicle management program, so the traffic and travel would be limited to existing roads and trails or permitted roads. In trails and perhaps dry washes and things of that nature. In other words, elimination of random, off-road vehicle travel, which could cause damage or which would cause damage to the environment. Careful management of the oil and gas activity and other types of things were included in that proposed action.

Alternative one is what we refer to as Existing Management. It's in some respects quite similar to the proposed action in that it would emphasize production of oil and gas, other minerals, livestock grazing and things of this nature; but the only specific management actions that were detailed for that area were to allow road building only in conjunction with oil and gas activity and require the closure of those lands upon their no longer being needed.

Alternative two begins to get us closer to the other end of the spectrum for Adobe Town, and that included a designation of 14,280 acres of the total 21,871 acres as wilderness. That's what we refer to as our Partial Wilderness

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Environmental Impact Statement on this subject has been published and is available in this room. In a moment I will call on a BLM representative to explain briefly the findings of the wilderness study.

The purpose of this hearing centers on two issues: First, are the wilderness study areas suitable or not suitable for designation as wilderness? Your views and any information you may offer with respect to this question will be greatly appreciated. Second, is the Draft Environmental Impact Statement adequate? Your comments and suggestions on this aspect of this study will also be appreciated.

In arranging for this public hearing, notice was sent to the United States Senators Wallop and Simpson and Representative Cheney, to Governor Herschler, and other elected officials. Also, we have notified Federal, State, and local government agencies and to the organizations and individuals known to be interested in the wilderness study.

Now for a few words about procedure. This hearing is not a debate, a trial, or a question-and-answer session. It is an advisory hearing and all interested persons may present statements, either written or oral or both, or other information pertinent to the wilderness study we are considering today. There will be no cross-examination from the audience, but if anyone fails to understand the statement of any speaker, you may direct a clarifying question to me, and I will determine

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recommendations as to whether the lands are suitable or not suitable for designation as wilderness. The law requires that a public hearing be held as part of the study process. That is what brings us here tonight.

The BLM has completed the first part of its wilderness study, and has published a Draft Environmental Statement containing its preliminary findings. Now it is the public's opportunity to comment on the matter.

After the hearing record closes on October 6, there will be a thorough review of the draft EIS. Your comments will be considered by the State Director BLM in making his recommendations to the Director in Washington, D.C., who must make a recommendation to the Secretary of the Interior. After due consideration, the Secretary will submit his recommendations to the President. The President in turn will transmit his recommendations to Congress. After appropriate consideration, which will include hearings, the Congress will accept, reject, or modify the President's proposal. Only Congress can designate an area as wilderness and only Congress can release a wilderness study area from its study status.

As you can see, the Bureau of Land Management's preliminary proposal before you today will undergo comprehensive review, and this public hearing and your views are a very important part of this review process.

Now I will call upon the Rawlins District

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of public comment received throughout the process. Number five is a careful look at local, social and economic effects from designation of an area as wilderness. And Number six is to determine if wilderness or non-wilderness was consistent with other agency plans, such as county land use plans and things of that nature.

The wilderness study for these two areas was done as part of BLM's Land Use Planning Process, or to use the BLM term, as part of our Management Framework Plan to study the resource areas.

After applying these evaluation criteria and quality standards, we arrived at preliminary recommendations for each of the areas. For Adobe Town the preliminary recommendation was that it was non-suitable for designation as wilderness. For the Ferris Mountains, the preliminary recommendation was that it is suitable.

Carrying this study EIS process forward, then these preliminary recommendations became the proposed action for the Draft Environmental Impact Statement that we are discussing here.

In that Environmental Impact Statement we also developed a series of alternatives to look at to analyze in the EIS, and those alternatives were designed to range from, at one end of the spectrum, preservation; and at the other end of the spectrum, so-called full resource production or logical

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Alternative. The remainder of the area would be managed as under the proposed action.

The final alternative for Adobe Town is an All Wilderness designation, and those were for Adobe Town, the four alternatives -- or proposed action and three alternatives that were analyzed.

For the Ferris Mountains, the proposed action is Wilderness Management, that is, designation of 20,415 acres as wilderness. The alternatives were as follows: Number one was Existing Management, a multiple use type format where we would continue mineral leasing, livestock grazing, and activity pretty much as they are at present.

Alternative two is what we have referred to as Primitive Management. We would allow the continuation of livestock grazing as under the present situation. We would not allow road building, and we would pursue a mineral withdrawal from the area.

Alternative number three is what we refer to as the Enhanced Wilderness Management alternative. It's identical to the proposed action with the exception that we would pursue a land exchange to acquire an additional 180 contiguous acres, or state or private land which lies along the periphery of the wilderness study area, and in one case, a 160 acre in-holding that would be done, of course, only with the respective land owner's blessing.

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1 That pretty much is it in a nutshell. That's the
2 basis for how the wilderness study was conducted, and that
3 quick description of the proposed action and alternatives for
4 the area. So I will turn it back to Mr. Conrad.

5 HEARING OFFICER CONRAD: Thank you, Gary.
6 Again, I would like to state that this is not an adversary
7 proceeding. Please extend common courtesy to the speakers and
8 refrain from commenting during the hearing. After the hearing,
9 if you wish, BLM employees will be available for discussion.

10 The three speakers that I have identified here, I
11 believe it would be appropriate if you would like to come up
12 here and make your statement so that the recording can be done
13 a lot easier, and we just got two more, so we have five now.
14 Let's try to hold this down to 20 minutes, no more than 20
15 minutes with the five speakers.

16 So when you come up, if you would identify yourself,
17 your name and who you represent properly so because I may not
18 have your name exactly right.

19 Let's start with Mike Massey. Would you like to
20 come up, sir. If you wish, you can sit down or you can stand.

21 MR. MASSEY: I can stand, even though podiums
22 are never tall enough for me.

23 STATEMENT

24 BY MR. MASSEY:
25 My name is Mike Massey, and I'm representing myself.

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1 offered, in other words.

2 However, in looking at the All Wilderness statement,
3 you know, I do agree that cultural -- or that wilderness will
4 benefit cultural resources, but it seems to concentrate strictly
5 on pot hunting. It doesn't really bring out how wilderness
6 will also protect resources by not allowing development.

7 So in the Adobe Town part of it, on page 5, once
8 again, it does state how this oil and gas development will
9 minimize impacts to cultural resources, but does not really
10 state how. In the Ferris Mountains, the same type of alterna-
11 tives, that is, development. It says that it will damage
12 cultural resources, so apparently energy development in Adobe
13 Town will minimize but in the Ferris Mountains, it will damage
14 cultural resources. I'm not really sure what difference exists
15 between the two wilderness areas, and that shows the inconsis-
16 tency of a lot of the statements within the DEIS.

17 Also, on page 47 on the Adobe Town portion of the
18 wilderness areas, it states that the areas within the Adobe
19 Town MSA or the Wilderness Study Area is a very high density
20 of prehistoric resources, which is true. However, it goes on
21 to say, and this is where I really get confused on some of the
22 statements, that allowing oil and gas development within this
23 wilderness study area will minimize impacts to the cultural
24 resources because it is a high density prehistoric area. That
25 really doesn't make sense. They are saying that oil and gas

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1 And I had a prepared statement coming in here. It's not going
2 to take 20 minutes. I'm used to coming in places where there
3 is a lot of statements, and mine is usually five minutes.

4 My background is I'm a historian, and I have been
5 working in the State of Wyoming for five years as a historian.
6 So I'm going to be talking about one particular aspect of this
7 DEIS. That's going to be the cultural resources aspect of it.

8 Southwest Wyoming, which includes Rawlins, and much
9 of the Rawlins BLM District is perhaps one of the richest
10 cultural areas in the state of Wyoming. Now, the BLM for the
11 most part, for most of its district have some very good
12 archeologists working for them to oversee these prehistoric
13 sites. However, this DEIS does not really reflect this expertise
14 I find this document exhibits many inconsistencies in its
15 comments and really fails to consider adequate measures of
16 protecting these important cultural resources.

17 So therefore, in answering some of these questions
18 which were posed earlier, I do not think that this document is
19 adequate when it comes to cultural resources. First of all,
20 to some of the inconsistent statements on the table on page 5,
21 it talks about that the impact of cultural resources from the
22 proposed alternative, that is, oil and gas development will be
23 minimized. However, it does not really state in that table or
24 anywhere else in the statement how this will be minimized, what
25 actions they will be taking to do this. There are no details

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1 Development is probably the best alternative because there are
2 so many archeological sites to run into out there.

3 Once again, I'm confused as to the fact that the
4 intensive resource management or energy development would have
5 the least long-term adverse effect on cultural resources, and
6 that's more so than not doing anything at all out there. Once
7 again, I am confused on how energy development, especially oil
8 and gas development, cannot hurt cultural resources and actually
9 help them. So those are the inconsistencies I find throughout
10 this document pretty much.

11 Now, the other thing which is in this DEIS, and
12 it's in most Federal agency DEIS's, is the statement that
13 existing cultural resource laws will protect our cultural
14 resources, even when there is energy development. Now, all
15 Federal agencies rely upon this like a crutch, and it's simply
16 not true most of the times, and there are many examples right
17 here within the Rawlins District where under existing laws,
18 energy development was taking place and we have lost some
19 very important cultural resources.

20 For instance, at this moment, or just a few days
21 ago up in South Pass City, which is within the Pauline District
22 Mining was allowed to occur within the National Register
23 District of South Pass City historic area. There was dynamite
24 blasting, and everything else occurred. The BLM was aware of
25 it, but according to them, the cultural resource laws did not

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1 apply to mining development, especially if they were mining for
2 gold. And there were many prehistoric as well as historic
3 resources that were lost because of this mining development.

4 Over at Miners Delight, not too far away from there,
5 once again, that was a very important historic site. Well, it
6 still is, but it had a lot of integrity left, many things left
7 laying there around the ground. However, the BLM advertised
8 the area as well as upgraded the road there, and much of that
9 area has been vandalized down to where even some doors were
10 taken.

11 Just not too long ago in the Frontier Pipeline,
12 which is being developed up near Split Rock, the BLM went and
13 told the company, "Here is where the Oregon Trail is. Please
14 miss it." And they lined it out, and probably no one did it
15 on purpose; but nevertheless, the bulldozer did blow some
16 very nice ruins of the Oregon Trail not too long ago. They are
17 gone now forever. And it may have been an accident, but they
18 are gone. Existing laws did not protect that part of the trail.

19 And finally, not too far west of here is a stage
20 station which used to be called the Duck Lake Stage Station.
21 It was a very important stage station, and it had one of the
22 best interiors left of any stage station on the Overland Trail,
23 and one winter an energy company bulldozer blasted it, so there
24 is nothing left. Archeologists went in there later and could
25 find very little left of it, including the bricks. That's gone

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1 the BLM would designate the eighty-one thousand some odd acres
2 as wilderness, and not consider the FLTPA leases, and then
3 possibly go back and have something between the 39 percent
4 wilderness and the 100 percent wilderness to something where
5 you can get a core on the Adobe Town of wilderness, protect
6 the cultural resources and allow some kind of periphery drilling
7 around the outside of that core.

8 In conclusion, in summing up, when I'm talking about
9 well, I'm not talking about cultural resources and wilderness
10 or pre-FLTPA leases or oil and gas fairways or the wealth of
11 multi-national corporations. When I talk about cultural
12 resources and wilderness, I'm talking about a part of our
13 past, a part of just about everybody in here in this room
14 right now. I'm not really talking about vast economic wealth
15 or economics for multi-national corporations. I'm talking
16 about our equality of life, and thanks.

17 HEARING OFFICER CONRAD: Thank you, Mike.
18 Now is Bruce Hamilton, and would you please again state your
19 name and who you represent.

20 STATEMENT

21 BY MR. HAMILTON:

22 Thank you. My name is Bruce Hamilton. I live in
23 Lander, Wyoming. I'm the regional representative to the Sierra
24 Club, and I'm here to represent our 150,000 members nationwide,
25 as well as the 20 members here in Wyoming, which is about 75%.

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1 now, too. So existing laws do not protect cultural resources,
2 even under the smallest type of energy development.

3 So this DEIS often downplays that and simply
4 dismisses it by saying existing laws will take care of it. And
5 they also downplay, therefore, the importance of wilderness
6 designation in protecting these cultural resources. There is
7 not this type of activity within wilderness areas, so these
8 resources often and 99 percent of the time will continue to
9 exist for people to enjoy and be able to see them. Therefore,
10 I feel that wilderness does protect a cultural resource, and
11 it should be emphasized much more in this DEIS.

12 So I guess in conclusion, with that statement, you
13 know, as a premise that wilderness does protect cultural
14 resources. So that I agree with the Ferris Mountain designation
15 as alternative one, and that is wilderness for the Ferris
16 Mountains because it will protect the cultural resources in
17 that area; and I would encourage the BLM to pursue also
18 alternative 1 for Adobe Town.

19 After looking carefully at it, none of the
20 alternatives are preferable to me in wanting wilderness to
21 protect those cultural resources out there, and it is a
22 unique archeological area. There's very few of them left in the
23 state like that. First of all, even the wilderness alternative
24 states that pre-FLTPA leases will be allowed to be developed.
25 Now, I would prefer to see an alternative -- I would propose

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1 I have a prepared written statement. I would like
2 to see that it's included in the official hearing report, and
3 I will just add a few oral comments to that. I'm here to
4 support wilderness for both Adobe Town and Ferris Mountains.
5 I think they are both highly deserving and they are both clearly
6 suitable for wilderness. I have hiked in, driven around the
7 edges of, and flown over both areas, and I don't think anyone
8 would really dispute the wilderness quality of these areas.
9 They clearly offer outstanding opportunities to solitude and
10 primitive, unadorned recreation. These are two of the best
11 examples we have on the entire public lands within the state
12 of Wyoming.

13 I think it's important to try and put this thing
14 in perspective to look at what has happened to our public land
15 here in Wyoming and realize how unique these areas are. When
16 the Bureau of Land Management designated their wilderness
17 inventory trying to look around all the public lands throughout
18 the state of Wyoming to try and see what might still have some
19 wilderness at wilderness, that we would continue to protect and
20 pass on to future generations, they found 37 percent of the
21 Bureau of Land Management managed land in this state was
22 already so encumbered with roads, pipelines, power lines,
23 whatever, that it was unsuitable to consider as wilderness.

24 So as they could only find about 1 percent of
25 some land that was still suitable, 3,000 acres and didn't

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1 have these kind of developments. And two of those pockets we
2 are talking about tonight, one the Ferris Mountains, and two,
3 Adobe Town.

4 It's just very dismaying to me to see as we start
5 getting the recommendations coming out of the Bureau of Land
6 Management that we cannot hold on to more than that till
7 finally we're talking about less than one percent of the BLM
8 land that is ever going to be kept intact in its present state
9 and passed on to our children. That's a real shame as far as
10 I'm concerned. I think we need to try hard to preserve more of
11 this because it really represents our heritage in this state.

12 I want to just talk briefly about the statement
13 that we have all been reading and talking about tonight. It's
14 one of the best statements I have ever read, and it's also got
15 some real pitfalls in it, and I have been reading a lot of
16 Bureau of Land Management wilderness studies from throughout
17 the country, and this particular one in my mind really
18 represents a schizophrenia on the part of the BLM, kind of a
19 Dr. Jekyll and Mr. Hyde because one half of the statement I
20 really think is the epitome of what these wilderness surveys
21 ought to be about, and the other half is just the opposite, as
22 it's not the conclusion there. The fact that they want
23 wilderness for the Ferris and the conclusion aside, it's the
24 basic conduct, the basic analysis that went into it so they
25 could reach those conclusions and how they did it.

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1 of it if we're lucky. And they don't develop those leases. I
2 don't think it's really providing the leadership and the land
3 management that the BLM ought to be doing in this area.

4 Look at the question of grazing. Again, the way
5 they approached it I think in the Ferris Mountains is commend-
6 able. They tried to objectively look at the situation and say
7 is this going to have an impact on grazing? If so, what is the
8 impact? And they tried to differentiate between the myth and
9 the realities, saying, you know, what is really going to go
10 on here? If this area was made roadless, are some people going
11 to have trouble with access where they had access in the past?
12 Can we expect a large infusion of hippy backpackers coming in
13 and forcing all the livestock? They really tried to analyze
14 that, and I think really dispelled many of the myth and said,
15 look, by and large, we don't think that this is going to be
16 damaging the livestock, but pretty much it's going to continue
17 the way it always has been. But this is a roadless area. It's
18 been managed as a roadless area. There's not a lot of vehicular
19 traffic in the area. There's not a lot of primitive recreation
20 going on there now, and there probably won't be if it's
21 designated. I think that kind of honest assessment is what
22 is needed, and I would commend the BLM for whatever they are
23 doing.

24 Take the flipside of the coin and look down at
25 Adobe Town. Instead of getting that same kind of objective

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1 For instance, look at what they did as far as
2 wilderness enhancement. The idea of let's look at all the
3 public lands within this block, and then let's look beyond that
4 and let's look at some of the minor public -- excuse me, state
5 in-holdings and private in-holdings and see what's the best way
6 to get the most manageable unit. It's a very commendable thing
7 they are doing in the Ferris. It's the first time I have ever
8 seen it done anywhere in the country.

9 I don't know at this time whether I endorse exchange
10 in acquiring all that land. I really came here tonight to
11 listen as well as to speak because I wanted to hear what the
12 ranchers and the State of Wyoming had to say about those, you
13 know, if they are amenable to land exchange. I really think
14 that's an important thing to do, and I would urge the BLM to
15 pursue it, so I really think that's a commendable approach.

16 Take the flipside of the coin, even in the All
17 Wilderness alternative that they haven't -- they say under the
18 All Wilderness alternative that means we will be able to manage
19 30 percent of the wilderness study area as wilderness. The 70
20 percent that makes up the rest of the land, they just dismiss
21 as hopeless because it's already leased for oil and gas, so the
22 idea of wilderness enhancement is all of a sudden totally out
23 the window, and instead we are talking about trying to salvage
24 something out of what we call the largest BLM wilderness study area
25 in the entire state of Wyoming. Maybe we can get 30 percent

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1 analysis to the grazing situation, instead they let some
2 livestock operators' fears get out of hand and gain publicity
3 in the drift BLM. They start talking about how all of a sudden
4 the livestock operators are going to get harassed right and
5 left. There's going to be litter and vandalism. When they
6 were talking about the Ferris Mountains, they said by and large,
7 litter and vandalism will not occur. I don't see what the
8 difference is, unless you have got some preordained outcomes
9 that your after wilderness in Ferris and nonwilderness in
10 Adobe Town, and you start trying to stack up all the reasons
11 to justify one decision or the other decision.

12 Look at the question of these pre-FLPMA and post-
13 FLPMA leases and how they were handled in the two WMAs, and
14 again, you get the same kind of dichotomy, the same Jekyll and
15 Hyde approach to what's going on in the wilderness analysis.
16 In the case of Ferris Mountains, I think they saw a superior
17 analysis of the thing. They tried to look at the whole mineral
18 situation, and they say what kind of mineral situation do we
19 have here? What kind of leasing pattern do we have here? Where
20 have we seen mineral activity in the past? What is the history
21 of mineral activity outside the WMAs and adjacent, and from
22 that try to define what might actually happen in there and
23 what kind of mineral representation we expect in the WMAs, and
24 what kind of activity might actually occur on those pre-FLPMA
25 and post-FLPMA leases. And when will those expire, and should

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1 we consider the alternative of when they expire pursuing a
2 mineral withdrawal so that we don't get the area encumbered
3 with leases in the future?

4 Excellent questions, excellent analysis, highly
5 commendable. Again, I haven't seen them anywhere else in the
6 country on any single BLM study. But then look at the flipside
7 of the coin on Adobe Town. They immediately say the area is
8 leased; and therefore, we have got to give up. There is no way
9 we can salvage the wilderness here, even if there is one part
10 of a single section of land that has a pre-FLPMA lease on it.
11 We are going to throw out the entire section of land and not
12 consider it for wilderness. There is no hope of salvaging.
13 They assume there will be one drill hole on every pre-FLPMA
14 lease at least every half mile or might have -- in other words,
15 just pocketing the whole area, and there is never really any
16 good analysis of what actually might take place there, and how
17 the BLM might direct it in order to try and avoid damaging the
18 area.

19 They just assume that at least 70 percent of the
20 area is going to be crisscrossed with roads, no matter what
21 they try to do. And I think that is just management. The
22 fact that they are the largest roadless area we have on BLM
23 land anywhere in the state of Wyoming, and the BLM is just
24 going to throw up its hands and say look, 70 percent of it is
25 going to be crisscrossed. We don't have any option but to let this

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1 take place. It just makes no sense.
2 What they ought to be doing instead is looking at
3 how to come up with a viable wilderness within that area. There
4 was never any analysis in this document of what is the highest
5 quality wilderness that you can find down in that Adobe Town
6 complex. What does the scenery look like? What are the
7 wildlife values, and is there some core area there that we
8 ought to be trying to preserve. And then if we identified that
9 area, how do we deal with the valid existing rights? Is there
10 a way where if somebody wants to develop their pre-FLPMA lease
11 that we can try to exchange them out of their wilderness
12 enhancement?

13 Instead it's a pre-FLPMA lease, therefore, pack
14 your bags and leave. It's as good as gone. It's no longer
15 public land. It belongs to the oil companies. Really the
16 wrong approach, I think, to this whole thing. They need to go
17 back to it again and do it in the public interest in time
18 instead of assuming that once it's leased to the oil and gas
19 companies for a couple bucks an acre that the public no longer
20 has anything to say about that land.

21 And that was a bad management decision made some
22 years past, that some of these areas should have been leased
23 when they probably shouldn't have. There have been other
24 decisions made in more recent times like the fact that it's a
25 wilderness study area, and just because one says first in time,

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1 doesn't necessarily mean it's first in right, and that is the
2 highest and best use.

3 Another question where you get this Jekyll and Hyde
4 thing is overuse by backpackers. I think there is a fairly
5 good analysis done in the Ferris Mountains saying it is probably
6 not going to get overrun. I think if you look at other
7 wilderness areas around the state, you can reach that same
8 conclusion.

9 Sierra Club just held an outing in the Ferris
10 Mountains last week, and it was advertised statewide, and we
11 had seven people attend. I mean, it's just not you're going
12 to get hordes of hundreds of people there or that they are
13 going to all of a sudden drive to there instead of the areas
14 that they now are overcrowding. It's a different kind of
15 experience, and some areas because they have a lot of high
16 mountain lakes and great climbing and are well known throughout
17 California, they get a lot of overcrowding. And other areas, you
18 know, like Hahnemann Wilderness or whatever, you just don't have
19 that same kind of popularity, the same kind of neon sign. And
20 they have been wilderness, and they don't have the same kind of
21 overcrowding, so I really think that that's a good analysis.
22 Again, done in the Ferris Mountains.

23 But you flip over the Adobe Town side, well, there
24 they don't talk about overuse, but they do talk about all the
25 trouble backpackers cause in the area, and again, I really

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1 think it's two kinds of analyses done on the two areas, and
2 they don't match up.

3 The last one I mention is impact on wildlife.
4 Again, in the Ferris Mountains side, I think they did a very
5 good study, saying that they think wilderness protection for
6 the Ferris Mountains is really the best way to protect that
7 wildlife population, and if there was development in the area,
8 a wildlife population would suffer.

9 What's missing on the other side of the coin is
10 looking objectively at the Adobe Town situation, that if you
11 are going to see intensive oil and gas development down there,
12 if indeed we are going to have one oil and gas well every half
13 mile or a mile and 70 percent of the area at the very least is
14 going to be crisscrossed with roads so you can't recognize
15 it as a potential wilderness area anymore, that's going to have
16 an adverse impact on the wildlife. And I think something more
17 could have been done to look at that.

18 What you have to do is look at what's happened to
19 the wildlife population over by Evanston where they are and
20 try to extrapolate that over to the Adobe Town situation and
21 see something that you might have there. And then crack those
22 figures into your social economic analysis. That just wasn't
23 done.

24 So in conclusion, I would hope that the BLM does
25 revise this draft BLM so that in the final version they will

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1 recommend wilderness for at least part of the Adobe Town area,
2 and I thank you for this opportunity to testify.

3 HEARING OFFICER CONARD: Thank you.

4 Mr. Hamilton. Our next speaker is Mr. Jim Taylor. Would you
5 come up, Jim.

6 STATEMENT

7 BY MR. TAYLOR:

8 Mr. Chairman, my name is Jim Taylor, and I'm a
9 senior landman for Champlin Petroleum Company in Denver. One
10 of my functions is that of public lands coordinator for the
11 Denver region. We would like to address the Ferris Mountains
12 WSA.

13 Champlin has an extensive Federal leasehold interest
14 within the Ferris Mountains WSA, contiguous to it and throughout
15 the general area.

16 We do not have sufficient significant data at this
17 time to say that a very definite potential exists for oil and
18 gas. However, at the present time we are conducting certain
19 surveys within the area, and we expect to have the results of
20 these surveys before the end of August.

21 If such surveys indicate that further study is
22 warranted, we would consider doing so at that time. In any
23 event, we will be most happy to share the results of the
24 initial studies with you provided that they do in fact confirm
25 the potential for oil and gas. And in that event, we would

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1 I feel that you at the BLM should be commended for
2 your analysis of the wilderness and recommend that wilderness
3 values can still exist in areas of former mining and jeep road
4 where and pre-FLPMA leases, and I'd like to express support for
5 further exploration at any rate of land exchange proposals with
6 the state hinging upon some equitable settlement of leases for
7 livestock operators in that area and that the ranchers input
8 in this matter should be a paramount concern when deciding if
9 that's appropriate.

10 I feel that the BLM treatment of the Ferris Mountains
11 in the Draft Environmental Impact Statement stands as an
12 outstanding example of what the agency can do in applying
13 appropriate wilderness criteria and following the intent of
14 Congress in 1964 Wilderness Act, and the agency would do well.
15 I feel, to follow a similar criteria in its Adobe Town
16 analysis.

17 And I would like to speak now in support of more
18 than a 30 percent of wilderness recommendation, and it's
19 so-called All Wilderness option for the Adobe Town area. From
20 my understanding from Wyoming policy and students that I have
21 had, that there is far more support for this area for wilderness.
22 than is indicated in the BLM recommendation.

23 Despite the roads and rigs, I think that there is
24 still a lot of opportunity for primitive and confined recreation,
25 solitude, outstanding wilderness experience. There still are

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1 plan to meet with you at a later date.

2 Thank you for your time and your consideration.

3 HEARING OFFICER CONARD: Thank you, Mr. Taylor.

4 Next on my list is Louise Wilcox. Would you please come up.

5 STATEMENT

6 BY MS. WILCOX:

7 I'm Louise Wilcox, and I'm a resident of Lander,
8 Wyoming, where I make my living as a mountaineering instructor
9 teaching people how to live safely in the wilderness of Wyoming
10 and the Rocky Mountain area without leaving any impacts in
11 the area. And I see students from all over the country who come
12 to Wyoming for the express purpose of seeing our wilderness and
13 our wildlife and experiencing our mountains and finding their
14 lives have somehow changed from that experience.

15 I find that the support for the Wyoming wilderness
16 the whole system and the debate that's coming up now is far
17 more than what is reflected by the BLM wilderness inventory.
18 Wyoming wilderness is really a national heritage, and I think
19 we should keep that in perspective when we are talking about
20 the Ferris Mountains and Adobe Town and the whole issue in the
21 state in general.

22 I'd like to take this opportunity to express my
23 support to the BLM wilderness recommendation in the Ferris
24 Mountains and a desire to see an expansion of wilderness in the
25 Adobe Town area.

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1 very vast amounts of uninventoryed archeological sites in the
2 area. Some of the oldest in the state are down there, as well
3 as unique ecological systems which have yet to be inventoried,
4 let alone evaluated, according to what impacts oil and gas
5 drilling is going to have on them.

6 And I feel that the BLM failed to sufficiently
7 inventory impacts on faunal species, vegetational species and
8 air quality. Air quality was almost ignored in the Adobe Town
9 analysis. So aside from these comments on the impact statement
10 itself, I'd like to address one issue which has been mentioned
11 by the BLM, and has been of concern to everyone interested in
12 the wilderness debate in Wyoming and nationwide, and that is
13 what Bruce referred to as the neon sign syndrome. The so-called
14 phenomenon of the massive influx of wilderness users with the
15 designation of an area as wilderness.

16 I feel too often that has been blamed for overuse
17 for a lot of reasons for not designating areas that are
18 otherwise appropriate for inclusion in the wilderness system.
19 I have done a little bit of looking into this issue several
20 years ago. I was just, I guess, I just finished working on
21 a thesis on wilderness management. I was kind of curious about
22 this question, and I did a study that was later published in
23 High Country News on the matter. And what I did was I wrote
24 about every manager of wilderness in the Rocky Mountain areas
25 and asked him what he personally thought about wilderness

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1 designation had done to use in that area and found that it was
2 a lot more complicated than just designation. Facilitate use
3 seems to be more directly related to an area's inherent
4 qualities, such as the presence of Grand Peaks or Alpine Lake's
5 full of trout, the publicity an area has received through
6 publication of guide books, you know, general TV shows, things
7 that happen to come out on an area will draw people. And let's
8 see, controversy such as lawsuits will attract people, make an
9 area, the name of an area ring a bell when vacation time rolls
10 around; that these things have a lot more to do with increasing
11 use than does designation, per se. In fact, I found a number
12 of areas have actually decreased with the designation of
13 wilderness.

14 So I don't think that this so-called neon sign
15 syndrome should stand in the way of otherwise intelligent
16 discussion of the inherent attributes of an area; and in fact,
17 this is generally a myth which I hope is put to rest, not just
18 in the Adobe Town area where I felt that it was a problem, but
19 for the entire wilderness debate nationwide.

20 In conclusion, I'd like to reiterate support for
21 the Ferris recommendations and hope that we can get something
22 there down in the Adobe Town area. Thank you.

23 HEARING OFFICER CONARD: Thank you.

24 Miss Wilcox. Next on my list is Murray Daniels. Would you
25 come up, please.

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1 MR. DANIELS: I misunderstood this because I
2 missed your introduction, so I have no comment to make.

3 HEARING OFFICER CONARD: Is there anyone else
4 who hasn't signed up that would like to make a formal statement?

5 If not, I will again assure you that the statements
6 that were made will be used by the Bureau of Land Management
7 for their final study, and with no further statements, I will
8 close this hearing.

9 (Hearing Proceedings concluded
10 at 8:03 p.m., July 26, 1983.)

11 CERTIFICATE

12 I, LORI ARNOLD, a Registered Professional Reporter,
13 do hereby certify that I reported by machine shorthand the
14 proceedings contained herein and that the foregoing 32 pages
15 constitute a full, true and correct transcript.


16 Dated this _____ day of _____, 1983.

17 _____
18 LORI ARNOLD

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1. The Comparative Analysis of Impacts (Table 2) has been revised to more accurately reflect expected impacts on various resources, including cultural resources.
2. The analysis of impacts to cultural resources in the Adobe Town WSA has been revised. Please see appropriate sections of chapter 4.
3. Please see the new Proposed Action. Also, please see the discussion of alternatives considered but dropped from analysis (chapter 1).
4. The analysis of the impacts on livestock management have been extensively changed to more accurately reflect those impacts.
5. Please see the new Proposed Action.
6. After further analysis, we have concluded that designating an area wilderness does not necessarily lead to recreational overuse. This issue was dropped from analysis in the final EIS.
7. Analysis of wildlife resources in both WSAs has been extensively changed in the final EIS. Please see the revised discussion in chapter 3 and chapter 4.
8. Our analysis concludes that these resources would be unaffected by either designation or nondesignation of the WSA.
9. See response 5 above.

1


United States Department of the Interior
BUREAU OF MINES
P.O. Box 1000
MOSCOW, IDAHO 83840-1000
SHEPHERD AVENUE
Intermountain Field Operations Center
August 1, 1993

Memorandum

To: District Manager, Snake River District, Bureau of Land Management, P.O. Box 470, Twin Falls, Wyoming 83401

From: Chief, Intermountain Field Operations Center

Subject: Review of Draft Environmental Impact Statement (DEIS) for Adobe Town and Ferris Mountains Wilderness Study Areas (WSA's) Carbon and Snake River Counties, Wyoming

Personnel of the Bureau of Mines have reviewed the subject document concerning two wilderness study areas in Wyoming. The Bureau of Mines primarily is concerned with the effects the proposed actions would have on mineral resources and their development in the area.

The Adobe Town WSA lies within an area of known reserves of natural gas, estimated as 1.0 to 1.5 trillion cubic feet, and the potential for natural gas production is high. The proposed action of the Wilderness designation with intensive resource management would encourage production of resources while managing the noncommunity resources of the area. Alternative 1, no action, would also encourage resource development while not increasing production costs to cover the expense of the protective stipulations of the proposed action.

The Ferris Mountain WSA has been proposed by the BLM for Wilderness designation and management. The Bureau of Mines, through interagency agreements, has been assigned to evaluate the mineral resources in the Ferris Mountain WSA during fiscal year 1993. Until that study is completed, a comprehensive evaluation of the proposed action is not possible.

Reported mineral occurrences in the Ferris Mountain WSA include copper, tungsten, gold, silver, scheelite, and silicite. Although past examinations of all mines and present sites have not indicated extensive mineralization in the area, the mineral examination assigned to the Bureau of Mines should be completed before the BLM recommendation for Wilderness designation is finalized. Some mineralization adjacent to the WSA may extend into the area and this possibility should be examined prior to issuance of the final EIS.

Donald P. Blanche
Donald P. Blanche

cc: Regional Environmental Officer,
Western Basin Region, Denver, Colo.

Responses to Letter No. 1

1. Note that the Proposed Action has changed from the Draft EIS.
2. Findings of the mineral examination noted in your letter will be incorporated into the Wilderness Study Report given to the Secretary of the Interior.

2b

COPY

State Director, BLM, State Office, P.O. Box 1822 May 17, 1993
Cheyenne, Wyoming 82001

Field Supervisor, Endangered Species, PAC, Billings, MT

Review of Biological Assessment for Adobe Town and Ferris Mountain Wilderness Environmental Impact Statement (EIS)


We have reviewed your biological assessment on the proposed actions and alternatives for Adobe Town and Ferris Mountain Wilderness EIS. We concur with your determination of "no effect" on the endangered bald eagle, peregrine falcon, and black-footed ferret as a result of any of the proposed actions or the alternatives.

The potential peregrine falcon habitat noted within the Ferris Mountain study area is of special interest from a falcon recovery standpoint. We encourage you to consider this habitat for special designation in the future when preparing the Habitat Management Plan for the Ferris Mountain WSA. Only through positive conservation measures such as this will protected recovery sites for falcons be insured.

Thank you for your efforts to meet our shared responsibilities to protect these endangered species.

M. Cretzinger

2a


UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
2120 Capital Avenue, Room 7070
Cheyenne, Wyoming 82002
August 19, 1993

Memorandum

To: District Manager, Bureau of Land Management, P.O. Box 470, Twin Falls, Wyoming 83401

From: Project Leader, Ecological Services

Subject: Review of the Adobe Town, Ferris Mountains Draft Wilderness Environmental Impact Statement

We have reviewed the subject DEIS and highly encourage that you recommend wilderness designation for both Adobe Town (Alternative 1) and the Ferris Mountains (proposed Action or Alternative 1).

The conclusion that Adobe Town is unsuitable for wilderness is, in our opinion, incorrect. This area contains some of the most outstanding ecological attributes in Wyoming and is nationally unique for its striking antelope landscape. Due to the pristine and fragile nature of this area and its importance to wildlife, we recommend that you reconsider your decision and nominate this area for wilderness designation.

We strongly support your recommendation to nominate the Ferris Mountain area for wilderness designation. The area exhibits extremely rugged terrain and contains very dense elk habitat and population. The riparian and peregrine falcon habitat noted within the Ferris Mountain study area is of special interest from a falcon recovery standpoint. We encourage you to consider this habitat for special designation in the future when preparing the Habitat Management Plan for the Ferris Mountain WSA. Only through positive conservation measures such as this will protected recovery sites for falcons be insured.

We appreciate the opportunity to comment on this DEIS.


John Johnson
John Johnson

cc: Regional Director, Denver, Colorado (1)
Field Supervisor, Billings, Montana (1)
Managing Game and Fish Department, Wyoming, Wyoming
Field Supervisor, Jackson, Wyoming (1)

Responses to Letter No. 2a

1. Please see the new Proposed Action for Adobe Town. No big game population was identified that would be affected by either designation or nondesignation of the WSA.
2. The Ferris Mountains were identified in the HMP as a possible site for peregrine recovery efforts. BLM searches of the cliffs during breeding season for peregrines in the springs of 1984 and 1986 failed to identify peregrines or nesting sites in the cliffs.

3


United States Department of the Interior
NATIONAL PARK SERVICE
BUREAU OF LAND MANAGEMENT
1919 2000-PC
August 4, 1993

Memorandum

To: District Manager, Snake River District, Bureau of Land Management, Twin Falls, Wyoming

From: Associate Regional Director, Planning and Resource Preservation, Rocky Mountain Region

Subject: Review of Draft Environmental Impact Statement for the Adobe Town-Ferris Mountain Wilderness Study Areas (WSAs), Carbon and Snake River Counties, Wyoming (DEIS 93142)

The National Park Service has reviewed the subject document and has the following comments:

The principal concern is about the Adobe Town WSA, based on its potential for diversifying the local and regional recreation base as well as the National Wilderness Preservation System (NWPS), protection of its cultural resources, and the potential designation of the Snake River as a National Natural Landmark. We recommend that the information for the action of the entire Adobe Town WSA for designation as wilderness and a more suitable comparison with the Ferris Mountain WSA.

Such revision could show that the Adobe Town WSA meets the wilderness planning criteria and quality standards on page 17 unless there is evidence to indicate otherwise. There should be a more critical evaluation of the statement on page 11 that recreational use under the proposed action would remain unchanged. Such an evaluation should question whether hunting, camping, hiking, and sightseeing in this area would be as appealing to anyone if they are faced with the prospect of "roads, facilities, and sights and sounds of oil and gas production" as stated on page 11.

We also suggest additional analysis with regard to reducing impacts to cultural resources. It should be recognized that excavating and/or disturbing archeological sites usually results in some loss of understanding about the resource since it becomes removed from its context. Further, the influx of additional workers into the area makes it questionable whether "standard operating procedures would protect cultural, visual, and paleontological resources" adequate as stated on page 18 without additional commitments of funds and manpower to enhance regulations.

Responses to Letter No. 3

1. As stated in chapter 4 (Environmental Consequences), there are certain pre-FLPMA leases which are considered to be valid existing rights and would be developed. If the entire WSA were designated wilderness, BLM would be faced with managing a wilderness within which would be several producing gas wells. This, in our opinion, means that the area would be unmanageable as wilderness. The Ferris Mountains WSA has no pre-FLPMA leases and, therefore, is not subject to the same concern. Our projections indicate that recreation in the Adobe Town WSA would remain essentially unchanged. Currently the dominant recreation activity in the WSA is antelope hunting. Even with full development, the quality of antelope hunting in the WSA would not change significantly.
2. The sections on cultural resources have been rewritten to reflect the ultimate loss of understanding that necessarily comes from salvaging cultural resource sites. The reference to standard operating procedures has been deleted.

Further, the Adams Town NSA is included within the boundaries of the Washoe Basin potential National Natural Landmark, such landmarks being recognized for their outstanding geological and ecological features. Page 29 notes that no ecosystem in the Working Basin Ecoregion has to date been included in the National Wilderness Preservation System (NWPS). The NWPS is a system of public lands that protect the uniqueness and beauty of the area. We believe wilderness designation is a logical protection to the recognized Landmark features. Further information on Washoe Basin and the National Natural Landmarks program can be obtained from Mr. Carolle Anderson, National Park Service, Rocky Mountain Region, 1615 North 1st Avenue, Recreation Planning and Review, P.O. Box 25287, Denver, Colorado 80225. Telephone: 303-854-1100.

Richard A. Swartz

4. The Washakie Basin potential National Natural Landmark is now noted in the chapter 3 discussion of the Adobe Town WSA's wilderness characteristics.

According to the system EPA uses to rate draft EIS's, the Ferris Mountain portion of the wilderness DEIS will be rated as 10-1. This means we have no objections to the preferred alternative and support its adoption. The Adobe Town portion of the wilderness DEIS will be rated as ER-2. This means we have environmental reservations regarding the proposed action and would like the partial wilderness alternative given further consideration. We would also like to see the aforementioned issues addressed in the final EIS. If you have any question regarding our comments, please contact Dennis Souchek at 214-761-2141, ext. 214.

Sincerely yours,


John G. Welles
Regional Administrator

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
1880 LINCOLN STREET
DENVER, COLORADO 80202-0000

NOV 1963

Bob Tigner
Pauline District
Bureau of Land Management
Box 470
Pauline, WV 26301

Page 49, Figure 1:

[illegible][illegible][illegible]

3. As of the writing of the final EIS, all nonunitized pre-FLPMA leases in the Adobe Town WSA have expired. This was, in part, what drove the creation of the new Proposed Action for the WSA. The pre-FLPMA leases in the Ferris Mountains WSA have also expired.

In developing the Proposed Action, many alternatives were examined, including alternatives larger than the original 16,280-acre partial wilderness. However, none of these reduced conflicts between wilderness preservation and natural gas production, nor did they add important wilderness attributes. Please see chapter 1 for further details.

**WYOMING
EXECUTIVE DEPARTMENT
CHEYENNE**

September 28, 1981

Mr. David Walter
District Manager
Kauai District
Bureau of Land Management
Box 670
Kauai, WY 82401

Dear Mr. Walter:

The draft environmental impact statement for the Adobe Town and Ferris Mountains Wilderness Study Areas in Carbon and Sweetwater Counties has been circulated for state agency review. Copies of agency comments are enclosed for your consideration and use.

At this time, no overall state position regarding the potential wilderness designation of BLM study areas in the Klamath District has been drafted. I view the subject document as an initial step in a long decision-making process. The review of the study areas has been completed for further analysis. Additional resource information developed during the review process, including that presented in several of the agency reports, will be fully incorporated into the Bureau trade-off analysis. In addition to any new resource information, public comments concerning commodity and non-commodity values, use, and management systems, and the protection and enhancement needs must be considered and balanced.

I encourage that the alternatives areas for the Twomits discuss several possible actions which could protect significant natural values within a non-wilderness, multiple-use context. The proposed action for Adobe Lake to encourage the production of resource commodities such as natural gas, while intensively managing the area to protect other high-value resource commodities, is correct in this point. I encourage the Bureau to further consider and disclose the full spectrum of available resource protection and management authorities so that the public is aware that there are ways to manage the area to protect natural values. I encourage the Bureau to consider the needs of the public lands short of wilderness designations.

1. Thank you. Please be assured BLM will work with the state of Wyoming regarding public comments, new resource information, use and management opportunities, and enhancement needs.

Mr. David Walter
September 24, 1981
Page 2

You are undoubtedly aware that I have continually voiced strong opposition to the inclusion of state-owned surface or mineral estates in BLM wilderness study areas. I have taken the position that the Bureau should exclude from wilderness consideration any study units which include state surface or mineral landholdings or have the potential to adversely impact access to and management of adjacent state-owned surface or mineral estates. As I told you State Representative in April 1981, if such units cannot be dropped, then any state surface or mineral ownership interests involved by BLM wilderness recommendations must be addressed through purchase or exchange arrangements which are satisfactory to the state.

I will be interested in the information and public comment generated in response to your draft document. I also intend to review the Rawlins District proposals within the context of the BLM wilderness evaluations, the eventual Congressional action on Wyoming's ROAD II wilderness recommendations, and the ongoing BLM and Forest Service land use planning efforts. Thank you for the opportunity to review and comment on this document. Please keep me informed of the progress in this effort.

David Walter

DW:jst

cc: Mr. Tom Livermore

Responses to Letter No. 6

1. These errors have been corrected.
2. Discussions of grazing and livestock management in the Ferris Mountains WSA has been revised in the final EIS. It was determined that livestock grazing and management would not appreciably change from present practices between any of the alternatives.
3. Table 5 (old table 2-8) has been revised with updated information. The wildlife section (chapter 3) for the Ferris Mountains WSA has been extensively revised.

Mr. Dick Hartman
August 19, 1981
Page 2

Page 68 - Table 2-8 should be revised. Current data suggest that estimated population sizes presented for some herd units may be in error. Specifically, we believe that estimates of the number of animals within the WSA may have been calculated incorrectly. Updated and corrected figures are provided below:

Species	Estimated Population in Ferris WSA		1981 Population in Ferris WSA		Berd Unit Population (2010) Estimated	
	Summer	Winter	Summer	Winter	Current	Proposed
Elk	100	100	100	100	100	100
White Deer	245	235	3,300	4,300	3,000	3,000
Antelope	470	100	5,400	4,300	3,500	4,000
			7,000	7,100	4,200	4,300
			(South Ferris)			
Highers	6-12	6-12	85	85	150	200
Sheep						

Page 68 - The Ferris elk herd was supplemented with transplants from Yellowstone National Park in the 1940's, and not "established" by them as stated on page 68 in the EIS. Our data include population estimates on this herd back to 1949, with 102 elk being counted in the Ferris and Sensitive Mountains in 1978.

Page 68 - No immigration of elk from the Ferris herd unit to the Green Mountain herd unit, as reported in the EIS, has been documented by this Department. Elk do cross between the herds, but there is no reason to believe the crosses are permanent or large-scale.

Page 69 - The portion of the Ferris Elk herd unit which actually inhabits the Ferris Mountains is currently estimated at about 200 animals, not 100.

Page 69 - The current best estimate of the size of the Ferris Deer herd is 4,300 animals, not the 3,000 mentioned in the EIS. Portions of this herd are migratory, as documented by Springer and Vasek's study. Most of these deer are east of the WSA. Most deer in the WSA apparently undergo altitudinal movements according to snow depths.

Page 70 - The North Ferris and South Ferris antelope herds have been decreasing, not increasing, as stated in the EIS. Some of the wildlife (aurochs, bison, and bighorn sheep) have changed in the past ten years from that which is mentioned in the EIS. As mentioned earlier, the estimated 1981 post-season population in the North Ferris herd was 4,300, with a current objective of 3,500, not 7,000. The estimate for the South Ferris herd was 7,100 with an

Mr. Dick Hartman
August 19, 1981
Page 3

objective of 4,200. Both objectives are considered unrealistic and objectives of 4,300 and 3,500, respectively have been proposed by this Department, pending public involvement.

Page 71 - Some of the information on higher transplants into the Ferris-Sensitive Mountains in this EIS is inaccurate. Transplant numbers and dates are shown below:

No. Sheep	Date
13	February, 1978
13	December, 1978
13	March, 1981
37	January, 1978
41	January, 1980

The current population objectives for this herd is 150 sheep.

Page 71 - We have no documentation of aurochs herds occurring in the Ferris Mountains. This EIS states that they occur.

Page 71 - Sage grouse brood-rearing habitat is also found on Cherry and Little Cherry creeks on the northwest slopes of the Ferris Mountains. Most of the best sage grouse habitat is located north of the WSA. We recommend that the preferred alternative, Wilderness Management, be adopted.

Please contact us if we may be of further help.

Sincerely,

Francis Peters
FRANCIS PETERS
ASSISTANT DIRECTOR
OPERATIONS
WYOMING GAME AND FISH

PP 9000 NLS
cc: Game Division
Fish Division

7

THE STATE OF WYOMING
ED HERSCHEL
GOVERNOR

WYOMING RECREATION COMMISSION
1001 N. G. STREET
ALBANY, WYOMING 82002

June 21, 1983

Mr. Dick Hartman
State Planning Coordinator
2205 Capitol Avenue
Cheyenne, Wyoming 82002

Dear Mr. Hartman:

The Adobe Town-Ferris Mountains Wilderness DEIS, A-95/83-124, was reviewed in this office. Thank you for giving us the opportunity to comment.

Enclosed is a memorandum from our staff historian and archaeologist who reviewed the materials. They indicate that provision must be made for cultural resources. Therefore, the Wyoming State Historic Preservation Officer (SHPO) recommends to the Bureau of Land Management that they grant cultural clearance in accordance with applicable state and federal laws only if their recommendations are followed. In the event that their recommendations are not followed, the SHPO will request that the BLM rescind clearance.

If you have any questions concerning these recommendations please contact the appropriate member of our staff:

Sincerely,
Mark Jung
Mark Jung, Deputy
State Historic Preservation Officer

FOR
Alvin F. Bastron, Director and
State Historic Preservation Officer

MCJ:slm
Encls.

Response to Letter No. 7

1. The existing federal laws and regulations, which require the consideration of the effects of any action planned, permitted, or licensed by the federal government on cultural resources will be complied regardless of which alternative is adopted.

8

WYOMING RECREATION COMMISSION
STATE HISTORIC PRESERVATION OFFICE
REVIEW AND COMPLIANCE

Interdisciplinary Staff Comments
Archaeology - History - Historical Architecture - Recreation Planning

TO: Mark Jung, Chief
FROM: Richard Bryant, Compliance Archaeologist
DATE: June 21, 1983 (District #2)
SUBJECT: A-95/83-124 Adobe Town-Ferris Mountains Wilderness DEIS

The wilderness designation options would provide maximum protection to cultural resource sites as it would limit development of the area and reduce visitor access. The BLM preferred alternative would allow development of the area and possibly may impact cultural resource sites. There are existing federal laws and regulations which require consideration of impacts to cultural resources on federal lands. As long as these protective measures are implemented prior to any project authorization, we have no objection to adoption of the BLM preferred alternative.

Response to Letter No. 8

1. The existing federal laws and regulations, which require the consideration of the effects of any action planned, permitted, or licensed by the federal government on cultural resources will be complied regardless of which alternative is adopted.

9

THE STATE OF WYOMING
ED HERSCHEL
GOVERNOR

WYOMING RECREATION COMMISSION
1001 N. G. STREET
ALBANY, WYOMING 82002

July 19, 1983

State Planning Coordinator
Wyoming State Clearinghouse
2205 Capitol Avenue
Cheyenne, WY 82002

RE: #83-124

Dear Mr. Hartman:

Having reviewed the proposed Adobe Town-Ferris Mountains wilderness Environmental Impact Statement, we have comments regarding portions of the text. The appropriate page numbers and proposed changes are as follows:

- 1) Page 29 - In reference to the geographic distribution of wilderness areas, it is suggested that only designated wilderness be mentioned. As administratively endorsed areas and areas of further planning may not be designated in the future, it is misleading to infer that substantial amounts of wilderness acreage exist in close proximity to the WSA.
- 2) Pages 30 and 46 - when discussing the Proposed Action, in particular off-road vehicle designations and management, it may be appropriate to discuss the administering agency's ability to carry out such strategies. Budgetary or personnel limitations could prevent enforcement of any regulations, encouraging surface disturbance at Adobe Town.
- 3) Page 33 - Within the discussion on Recreation Resources, it should be noted that a loss of wilderness type recreation will occur given the proposed action. Oil and gas exploration will discourage such use, although increased access will facilitate ORV use.
- 4) Pages 57 to 60 need to be put in correct order.

Responses to Letter No. 9

1. This section has been deleted entirely in the final EIS.
2. Our projections indicate that there would be little increase in ORV use in nondesignated areas. Wyoming BLM policy is that in areas where ORV travel is limited to designated roads and trails, open routes would be so delineated using white arrows.
3. Please note that the Proposed Action is different than that in the draft EIS. However, a loss of "wilderness type recreation" is implied in the analysis on impacts on wilderness values. It should be noted that the dominant recreation activity in the Adobe Town WSA is antelope and deer hunting.

State Planning Coordinator
July 19, 1983
Page 2

Thank you for the opportunity to review this EIS. We hope the comments are helpful.

Sincerely,
Karen J. Ambrose
Karen J. Ambrose
Recreation Resource Specialist

KJA/sab
Enclosure

10

THE GEOLOGICAL SURVEY OF WYOMING
UNIVERSITY OF WYOMING
800 WEST UNIVERSITY AVENUE
LARAMIE WYOMING 82001
(307) 762-2000

TO: Rick Mortenson, State Planning Coordinator
Wyoming State Capitol Building
Cheyenne, Wyoming 82002

FROM: Gary B. Glass, State Geologist
Ray Morris, Industrial Minerals Geologist
A. Don Hunsley, Deputy Director/Minerals Geologist
James C. Case, Environmental Geologist

SUBJECT: Adobe Town Ferris Mountains Wilderness DEIS
State Identifier No. 80-124

DATE: July 15, 1983

My staff and I submit the following comments on the Adobe Town Ferris Mountains DEIS.

Adobe Town Wilderness assessment

1. We concur with the U.S. Bureau of Land Management's Proposed Action - No Wilderness. Interior Resource Management - for the Adobe Town WSA.
2. In addition, however, we noted that the DEIS underestimates the potential for finding significant zeolite occurrences in that WSA.
3. We also note that even an "Intermittent Resource Management Strategy" for the Adobe Town area, may permit changes that could affect the ability of land owners and the hydrology of the area. Presumably, however, this type of strategy does reduce the chances for undesirable or irreversible changes.

Ferris Mountains Wilderness assessment

1. We do not concur with the U.S. Bureau of Land Management's Proposed Action - Wilderness Management - for the Ferris Mountains WSA.
2. We still feel the Ferris Mountains WSA has High Mineral Potential i.e., it most probably contains some commercially valuable mineral deposits. There is evidence that this WSA may contain copper, boron, gold, silver, cobalt, lead, zinc, oil and gas, and industrial minerals.

Responses to Letter No. 10

1. Please note that the Proposed Action has changed from the draft EIS.
2. The potential for finding zeolite mineral occurrences in the Adobe Town WSA is presently based on literature searches and some preliminary field work done by BLM during the summer of 1980. The U.S. Bureau of Mines and Geological Survey will conduct a final mineral survey of the area prior to final recommendation to the President.
3. We do not anticipate major changes in the sand dunes or hydrology of the Adobe Town WSA.
4. The U.S. Bureau of Mines and Geological Survey will also be conducting a mineral survey on the Ferris Mountains WSA. The mineral surveys already conducted in the WSA are preliminary in nature. A detailed systematic exploration of the Ferris Mountains WSA may be the only way to precisely determine mineral potential. The traditional interpretation of the structure of the Ferris Mountains has been block faulting in a nearly vertical plane on the south flank. The new hypothesis being put forward is a model involving thrust faulting. The former interpretation is a preferred model at this point.
5. The word should be "geographical."

1. We also feel that the Bureau of Land Management's sampling and exploration of the Ferris Mountains WSA as described on pages 98-101 was a perfunctory effort, and not a valid mineral assessment. As we stated over a year ago, the Ferris Mountains WSA needs detailed, systematic exploration.

2. Also on Page 98, the Bureau of Land Management established that oil and gas wells are being drilled through the Ferris Mountains i.e., "Block faulting" and "thrusting", there is not indicate a preferred model. We believe the "thrusting" model is likely enough that it's implications i.e., that there is oil and gas potential under at least portions of the WSA, should not be ignored.

3. In our opinion, areas with High Mineral Potential should not be made into Wilderness Areas. We make this recommendation fully aware that there are other values than minerals, but we stress that High Mineral Potential areas are too valuable to lock up. As an alternative, we suggest that the Bureau of Land Management place this area under an "Intermittent Resource Management" strategy rather than Wilderness.

4. The Bureau of Land Management is also considering an "Enhanced Management" alternative, which recommends the inclusion of some adjacent State-owned lands. The State should not agree to this alternative. If the State-owned lands are not part of the Wilderness Area, mineral exploration on at least some of the State lands. We suggest a fair exchange for these State-owned lands may not be possible since the Bureau of Land Management has obviously decided that the mineral potential of the lands is low to moderate by their standards.

5. The last sentence on Page 12, left column, under Development of Alternatives, first paragraph, is unclear. The DEIS states that the Enhanced Management alternative is included because of the "geographical" relationship of the involved lands. "Geographical" refers to the physics of the earth including topography, geology, hydrology, geomorphology, etc. We do not think this is what the DEIS meant.

11

THE STATE OF WYOMING
Wyoming Department of Agriculture
TELEPHONE (307) 777-7521 CHEYENNE WYOMING 82002

TO: Rick Mortenson, State Planning Coordinator
Wyoming State Capitol Building
Cheyenne, Wyoming 82002

FROM: Don Davis, Assistant Commissioner

SUBJECT: Adobe Town Ferris Mountains Wilderness DEIS

Attached are the comments of Colin Fallis, Division of Agriculture Planning and Development, on the Ferris Mountains Wilderness Draft Environmental Impact Statement.

My Fallis's comments reflect those of this Department.

Thank you for the opportunity to comment on this draft statement.

CC/Plan
attachment

"ALBION L.I.I.B. - the backbone of Wyoming"

Response to Letter No. 11

1. Thank you for your comments.

12

THE STATE OF WYOMING
Wyoming Department of Agriculture
TELEPHONE (307) 777-7521 CHEYENNE WYOMING 82002

TO: Rick Mortenson, State Planning Coordinator
Wyoming State Capitol Building
Cheyenne, Wyoming 82002

FROM: Colin Fallis

SUBJECT: Adobe Town Ferris Mountains Wilderness DEIS

The Division of Agriculture Planning and Development has reviewed the above referenced DEIS. The division supports alternative 1, which is the no action alternative. The division is based on the fact that grazing is the only other alternative will be minerals affected. It is vital that the completed grazing patterns, which have been established for many years not be interrupted.

Thank you for the opportunity to review this DEIS.

CC/Plan

"ALBION L.I.I.B. - the backbone of Wyoming"

Response to Letter No. 12

1. Thank you for your comments.

13

THE STATE OF WYOMING
 DEPARTMENT OF ENVIRONMENTAL QUALITY
 Water Quality Division
 CHEYENNE, WYOMING 82002
 TELEPHONE 387 777 7781

MEMORANDUM

TO: Robert Sundin, Director, BQD
 FROM: E.J. Fleming, Water Quality Staff Specialist
 DATE: July 28, 1983
 SUBJECT: EIS, Adobe Town - Ferris Mountains Wilderness

ADDITIONAL TO: USA

No comment based on page 21 - Unaffected Aspects of the Environment

FERRIS MOUNTAINS WSA

Planning section efforts support for wilderness designation to maintain the high quality watershed values associated with the range.

Response to Letter No. 13

1. Thank you for your comments.

14

THE STATE OF WYOMING
 DEPARTMENT OF ENVIRONMENTAL QUALITY
 WATER QUALITY DIVISION
 CHEYENNE, WYOMING 82002
 TELEPHONE 387 777 7781

MEMORANDUM

TO: Dick Hartman, State Planning Coordinator
 FROM: Donald R. Reake, State Oil and Gas Supervisor
 DATE: June 17, 1983
 SUBJECT: Adobe Town - Ferris Mountains Wilderness
 Draft EIS Number 83-124

Dear Mr. Hartman:

In reply to your memorandum of June 16, 1983 requesting comments on the aforementioned EIS, this is to advise that I support the reserve estimate of Barlow & Nease and Myers with respect to the natural gas resources that underlie the Adobe Town proposed Wilderness Area.

The high estimate offered by Barlow & Nease was 3.8 trillion cubic feet of gas, which is reduced to 1.9 trillion cubic feet of gas after cutting the area down in size.

I would, therefore, recommend and urge that the Adobe Town Area not be tied up so that oil and gas development cannot take place. Admittedly, there is a surplus of natural gas on the market at the present time. This may not last forever.

Very truly yours,
 Donald R. Reake,
 State Oil and Gas Supervisor

Response to Letter No. 14

1. Thank you for your comments.

15

THE STATE OF WYOMING
 DEPARTMENT OF ENVIRONMENTAL QUALITY
 WATER QUALITY DIVISION
 CHEYENNE, WYOMING 82002

MEMORANDUM

TO: Dick Hartman, State Planning Coordinator
 FROM: Louis E. Allen, Water Resources Engineer
 DATE: July 11, 1983
 SUBJECT: State Identifier No. 83-124, Adobe Town - Ferris Mountains Wilderness Draft EIS, BLM

I concur with the Adobe Town proposed action and preferred alternative of no wilderness, Intensive Resource Management. The rationale for this preference includes the many valid oil and gas leases in the area, but not concern is with the many water developments (mostly for livestock) within the wilderness Study Area (WSA). The proposed action would not interfere with the maintenance of existing water developments, and would allow construction of new ones.

The proposed action for the Ferris Mountains WSA is Wilderness Management, adding it to the extensive acreage already listed as wilderness designation in the state. The following statements in the DRI help to ease the concerns of this office for such designation, especially in view of the limited opportunity for water development in this WSA.

Page 86, Forest column. Referring to BLM Wilderness Management Policy which provides for continued livestock grazing in wilderness areas, "it allows for maintenance of existing support facilities such as fences, line cabins, and water developments." Further along, "also, new facilities could be constructed if they conformed with the guidelines and management plans governing the area. In summary, the guidelines show that Congress intended for livestock grazing to continue as a viable and legitimate use of designated wilderness."

The only heading identified with water resources listed in the contents is found under Background Information on page 15, and is directed to the lack of drawing water in the Adobe Town WSA. The one reason the several alluvial resources in the WSA are not mentioned under that heading in the Adobe Town WSA portion of the DRI, nor is the general hydrologic picture noted there, although, these subjects are noted incidentally under other headings in the Adobe Town treatment.

Responses to Letter No. 15

1. The water resources section has been deleted from the final EIS. Stock water reservoirs are discussed in the livestock grazing section.
2. The Ferris Mountains WSA contains no water developments. Livestock and wildlife obtain water from the natural drainages and from water developments outside the WSA.
3. Acreage corrections have been made in the final EIS.

16

THE STATE OF WYOMING
 DEPARTMENT OF ENVIRONMENTAL QUALITY
 WATER QUALITY DIVISION
 CHEYENNE, WYOMING 82002

MEMORANDUM

TO: Dick Hartman, State Planning Coordinator
 FROM: George E. Christopoulos, State Engineer
 DATE: July 11, 1983
 SUBJECT: Adobe Town - Ferris Mountains Wilderness Draft EIS, BLM

The Ferris Mountains WSA portion of the DRI also has no water resources heading or specific discussion. There are some scattered references to water throughout this portion but they carry little useful information. There is no mention of the existence or absence of any water development within the WSA. We are left to assume that the livestock and wildlife obtain their water from the few streams and other natural sources of water.

I found two specific errors or oversights in the DRI that BLM should be aware of. On page 52, Table 2-3, the tabulated wilderness alternative shows 20,445 acres for the WSA, as for all other alternatives. Recommended for acquisition are 1,800 acres, with a total proposed area total of 20,445, the same total as the others with area acquisition. At the bottom of page 58 there is the beginning of a sentence which is apparently continued on page 60, after skipping across other discussions on page 59.

Thank you for the opportunity to review the DRI and submit comments. Your referral memorandum is being returned as requested.

LEA/AT
 George E. Christopoulos
 State Engineer

10. This reference has been deleted.

11. This table has been corrected.

12. This map has been corrected.


10. This reference has been deleted.

11. This table has been corrected.

12. This map has been corrected.

- This reference has been deleted.
- This table has been corrected.
- This map has been corrected.

19



Sierra Club
Northern Great Plains Region

Steve Hamilton
Regional Representative
P.O. Box 1075
Lander, Wyo. 82502
(307) 333-8934
Oct. 19, 1983

Ross McCullough
Assistant Representative
715 South 14th
Laramie, Wyo. 82002
(307) 333-7002

Gary Long
Bureau of Land Management
Box 670
Burlington, UT 82701

Dear Gary:

Thanks for sending me a copy of the new BLM guidelines as printed in the July 17, 1983 Federal Register. As I told you at the Adobe Town/Ferris Mountains hearing, I still disagree strongly with the way the BLM is handling the oil and gas pre-FLM issues. I think the talking language is contained in the new sections 6.7.5 and 2.2.4. I quote:

"Activities for the use and development of such lands must satisfy the nonmanagement criteria unless this would unreasonably interfere with the rights of the Federal as set forth in the Federal Lease. When it is determined that the rights can be exercised only through activities that will impair wilderness suitability, the activities will be regulated to prevent unnecessary and undue degradation." (Emphasis added.)

It seems clear to me that the BLM has an obligation first to try to make all operations meet the nonmanagement criteria. Only after every effort is made to have a pre-FLM operation conform to the nonmanagement standard is the BLM allowed to consider allowing an activity that would impair the wilderness character. Even then, the BLM is required to make a determination that the right conveyed can only be exercised if impairment is allowed. This two step process gives the BLM a good deal of leeway and leeway in deciding on management or action, even in pre-FLM areas.


The part of the Adobe Town analysis that troubles me the most is the willingness to give up without a struggle on all sections of wild country that have even part of a pre-FLM lease on them. This appears to be contrary to the direction being issued. Instead of just accepting an operator's plan for impairment on a pre-FLM lease the BLM should insist on as many parts of the operation as possible meeting the nonmanagement standard. In many cases, especially in the relatively flat country of the Adobe Town area, it would be completely reasonable to insist on no other access roads and reconstructing and regrading of any new sites so that impairment is kept to an absolute minimum. One could even insist on clear drilling from roads in the Adobe Town area if it would not be an unreasonable interference with the exercise of lease rights.

Do you understand what I'm saying? Do you see this as a reasonable interpretation? Do you think what I'm saying can be rewritten to reflect this obligation? Please let me know what you think. I would be glad to include these same thoughts in a letter to the District Manager or his insurance if necessary.

Sincerely,
Steve Hamilton
Regional Representative

"No blind opposition to progress, but opposition to blind progress."

20



THE WILDERNESS SOCIETY

August 3, 1983

Mr. David L. Walter
District Manager
Bureau of Land Management
1300 Third Street
Box 670
Burlington, Wyoming 82701

Dear Mr. Walter:

I am submitting the following comments on behalf of the Wilderness Society and its 85,000 members. We are a national conservation organization with over 300 chapters in Wyoming. We have been actively involved in the BLM wilderness review process both in the field and in Washington, D.C. where we have a full time BLM issues program headed by Terry Vaher, a 12 year veteran of the BLM.

The Wilderness Society strongly supports wilderness recommendations for both the Adobe Town and Ferris Mountains Wilderness Study Areas. There is no question that both of these areas contain outstanding wilderness characteristics. With so little BLM landless acreage left in Wyoming, we believe that it is a crime that one of the most outstanding areas, Adobe Town, is not recommended.

We wish to commend the approach you are taking with respect to wilderness enhancement and land exchange in the Ferris Mountains. This should be copied elsewhere, including Adobe Town.

In our opinion, the most impressive aspect of the document is your evaluation of oil and gas potential and conflicts in the Ferris Mountains. We wonder why this same analysis was not applied to Adobe Town when it is clear that the only reason this area is not recommended is because of supposed oil and gas conflicts.

Finally, we wish to commend your deferring potential oil problems to a wilderness management plan rather than using the potential problem as a pretext as an excuse for a non-recommendation.

NORTHERN ROCKIES REGIONAL OFFICE
633 WEST STANLEY STREET, SUITE 400, BOULDER, COLORADO 80502
(303) 442-8151

Response to Letter No. 19

- Please see the new Proposed Action.

Responses to Letter No. 20

- Please see the new Proposed Action for the Adobe Town WSA. Also, please see chapter 1 for a discussion of alternatives considered but dropped from analysis.
- It is contrary to BLM policy to use an ACEC designation as an alternative in a wilderness EIS unless such a decision is in a current MFP or RMP. No such decision exists for the Adobe Town WSA.

CELSIUS ENERGY COMPANY

P.O. BOX 670 • RAILIN, WY 82301 • TEL. 307-326-1000 • FAX 307-326-1001

August 17, 1983

Mr. Bob Tigner
Bureau of Land Management
P.O. Box 670, 1300 Third Street
Rawlins, WY 82301

RE: Adobe Town
Management Framework Plan Amendment
WY-030-401/WY-040-408

Dear Mr. Tigner:

Celsius Energy Company, a wholly owned affiliate of Mountain Fuel Supply Company, has reviewed the Adobe Town USA. Celsius Energy Company agrees with the Bureau of Land Management that the Adobe Town area would be unsuitable for wilderness designation.

The Celsius Energy Company is an oil and gas exploration firm that has considerable leaseholdings within and near Adobe Town. The area lies in close proximity to producing hydrocarbon fields. The continued expansion of the Wild Rose field to the south and west is considered highly probable in the future.

The economic development of the Adobe Town area should be given high priority in the Bureau of Land Management planning process.

Sincerely,

G. Gregory Francis
Western Division Exploration Manager

1cc

cc: Roland Gilt

Response to Letter No. 23

1. Please note that the Proposed Action has changed from the draft EIS.

CELSIUS ENERGY COMPANY

P.O. BOX 670 • RAILIN, WY 82301 • TEL. 307-326-1000 • FAX 307-326-1001

August 17, 1983

Mr. Bob Tigner
Bureau of Land Management
P.O. Box 670, 1300 Third Street
Rawlins, WY 82301

RE: Ferris Mountains USA - WY-030-407

Dear Mr. Tigner:

Celsius Energy Company, a wholly owned affiliate of Mountain Fuel Supply Company, has reviewed the Ferris Mountain USA. The Celsius Energy Company is an oil and gas exploration firm that is active in its exploration efforts in Ferris Mountains USA.

Celsius Energy Company strongly recommends that the Ferris Mountain area not have a wilderness designation. The Ferris Mountain area is a part of one of the last frontier areas within the United States that has a great mineral potential. It is of great importance that the mineral wealth be developed as it would have significant national economic value.

The Ferris Mountain USA lies within the Foreland Thrust Belt Province of central Wyoming. The Ferris Mountain USA is a part of the Enigrant Trail Foreland thrust system. Hydrocarbon exploration along the Enigrant Trail Thrust system is just starting to develop. Sedimentary rocks, with hydrocarbon production in other areas, are known to exist beneath the Enigrant Trail Thrust. These sedimentary rocks would be the objective for any hydrocarbon exploration in the Ferris Mountain area.

The significance of foreland thrust exploration in the Rocky Mountains has been discussed in detail by Robbie Gries of Amstar, Inc., (see AAPG, Bull., Vol. 67, No. 1). Celsius Energy strongly recommends that Ferris Mountains should not be included in any future Bureau of Land Management RMP.

Sincerely,

G. Gregory Francis
Western Division Exploration Manager

1cc

cc: Roland Gilt

Chesapeake USA Inc.
700 South Corporate Blvd. P.O. Box 100 Denver, CO 80201

Robert F. Wright
Vice President
Superior and Regulatory Affairs

June 28, 1983

Draft Wilderness EIS
Adobe Town and Ferris Mountains WSA

District Manager
Bureau of Land Management
P.O. Box 470
Rapidville, UT 82301

CU-143104-1

Thank you for this opportunity to comment on the captioned document. We commented twice during the writing process (September 14, 1982 letter to the District Manager and November 12, 1982 letter to Mr. Bob Janney), but would like to restate our concerns at this time.

Our major concern has been, and continues to be your apparent understatement of the oil and gas potential within the Ferris Mountains WSA. While this area is relatively unexplored, there is significant interest and, as you indicate in the EIS, current seismic activities may lead to some exploratory drilling. We have no more current or detailed information than was provided in our November 12 letter to Mr. Janney, but we urge you to reconsider whether wilderness is the most appropriate land use designation for the Ferris Mountains WSA.

Sincerely,

R. F. Wright

RTW:mc

Control Region - Exploration, Land and Production

Response to Letter No. 24

1. Industry has suggested a hypothesis that the Ferris Mountains have been involved in some recumbent folding and/or thrust faulting which has placed sedimentary rocks underneath the Precambrian. If this were the case, it would indicate potential for oil and gas accumulations. Two geophysical studies, one in 1982 and one in 1983, have been conducted in and near the Ferris Mountains WSA. Neither produced evidence in support of the new hypothesis. This, combined with our interpretation of the geologic structure of the WSA, leads us to the conclusion that oil and gas potential in the Ferris Mountains is low.

MEC
MINERALS
EXPLORATION
COALITION

Minerals Address
c/o Public Policy

1000 West Lake Drive
P.O. Box 100
Denver, Colorado 80201

September 21, 1983

District Manager
Bureau of Land Management
Box 470
Rapidville, Wyoming 82301

Dear Sir:

These comments constitute the response of the Minerals Exploration Coalition (MEC) to the Adobe Town - Ferris Mountains Draft Wilderness Environmental Impact Statement. The MEC is a coalition of exploration companies and individuals conducting exploration on public lands.

We believe that all areas with mineral and energy potential should be included from wilderness designation, even though an economic deposit is not known. Wilderness limitations will prevent the collection of new data, and new areas of mineral potential will not be known. With new discoveries effectively stopped, a policy of excluding all currently known areas of mineral potential from wilderness should be followed as that exploration will not be restricted and minerals might yet be produced. We believe that land use decisions should conform to the BLM Mineral Resource Policy of November 1, 1982, which states that "mineral exploration and development can occur concurrently or sequentially with other resource uses."

The MEC favors the proposed action of no wilderness for the Adobe Town area because of the high oil and gas values and the important issues.

We oppose the proposed action of wilderness management of the Ferris Mountains area. The oil and gas potential may be low, however, because of cost and exploration should continue to determine the extent of oil and gas deposits that might be produced.

Minerals Address

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Executive Committee member

Response to Letter No. 25

1. Please note that the Proposed Action has changed from the draft EIS.



Executive Director
Robert T. Haddock

220 North Center Street
P.O. Box 470
Rapidville, WY 82301

A DIVISION OF WYDOGA

Assistant Director
Wanda H. Finkbeiner

September 27, 1983

Mr. Bob Tigner
Bureau of Land Management
P.O. Box 470
Rapidville, WY 82301

Dear Mr. Tigner:

On behalf of the Petroleum Association of Wyoming (PAW), a division of the Rocky Mountain Oil and Gas Association, whose members account for more than 90% of the petroleum produced and 90% of the wells drilled in Wyoming, please accept the following comments on the draft Adobe Town - Ferris Mountains Wilderness Environmental Impact Statement (EIS).

Adobe Town WSA

We are in general agreement with the recommendation of "no wilderness" for the Adobe Town Wilderness Study Area (WSA). The proposed action reflects a realistic assessment of existing and potential oil and gas activities as well as other multiple use opportunities in the WSA.

The PAW recognizes that various compliance stipulations which might be imposed upon the oil and gas industry will increase production costs and thus eventually increase the cost of petroleum products to the consuming public. In order to keep these additional costs of compliance to a minimum we suggest that all stipulations be examined very carefully to determine if they are necessary and/or appropriate.

Whereas we do see a comprehensive list of all possible stipulations to be imposed upon the mineral industry under the proposed action. We request a summary of all restrictive measures, the averages involved for each stipulation, and complete justification for each restriction.

On page 43 of the EIS it is stated that "...important raptor nesting sites will be protected." Are there any nesting sites identified at this time? What will the stipulation entail? We oppose the establishment of buffer zones around raptor nests. Will a distance restriction be imposed? What will that be?

Responses to Letter No. 26

- Wyoming BLM has adopted standard stipulations for oil and gas leases (see Appendix). These would be used on new leases as needed. Existing leases are subject to stipulations already attached to the lease. All new leases in the Adobe Town WSA would be subject to Stipulations No. 1 (Surface Disturbance Stipulation) and No. 2b (Wildlife Stipulation - Raptors).
- Several raptor nesting sites have been identified in the Adobe Town WSA. The Stipulation No. 2b mentioned above specifies the constraints that might be imposed to protect nesting sites.
- Very little antelope crucial winter range is actually in the WSA. This analysis has been deleted from the final EIS.
- This discussion has been deleted from the final EIS.
- Please see response 1 to Letter No. 24. The EIS sections on Energy and Mineral Resources in the Ferris Mountains were written based on literature searches, personal communication with industry and individuals familiar with the area, and a preliminary



A DIVISION OF RMGMA
200 South Center Suite 115
Casper, Wyoming 82401

Mr. Bob Tigner
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September 20, 1981

On page 15, it is also stated that "...new road construction in the area (road) winter range will be minimized." How many acres are in this proposed classification? Considering current wildlife population and needs are such restrictions necessary? Are there other stipulations being considered for crucial wildlife winter range?

The DRI contains the statement, "Thereafter will be identified in the Highpriority habitat types, thereby maintaining the current vegetation as well as possible." (p. 15). The meaning of this statement is not entirely clear. What are "Highpriority habitat types", and what are "vegetative models"? How will disturbance of these "types" be assessed? How will areas be identified?

Ferris Mountains WSA

While the mineral potential in the Ferris Mountains WSA is not as well established as in the Snake River WSA, we do not believe that it is appropriate to assume that mineral development is unlikely to occur.

Existing technology and current geological knowledge of this area has not supported a high mineral potential rating, however, without further exploration and geophysical study, we believe it is premature to say that this area has no potential. Recent mineral values in the WSA have not been documented, and in light of recent geological interpretations as to the origin of this area, we do not believe that the WSA should be re-assessed for oil and gas.

The DRI makes reference to recent geophysical studies being conducted in and near the Ferris Mountains WSA. These studies suggest that there is interest in further establishing the area's mineral potential. It is unreasonable to prematurely lock-up this area until the results of such studies are available, and additional exploratory drilling can be conducted. Adequate studies of the area would not be permitted under wilderness management, thus prohibiting any further analysis of mineral value.

Due to the relative uncertainty of oil and gas potential in the Ferris Mountains WSA, we believe that it would be contrary to the intent of the Federal Land Policy and Management Act (FLPMA), to recommend this area for wilderness at this time.

The inference of low mineral potential is supported only by vague statements such as, "The likelihood that drilling will occur is not high because the geological conditions do not seem to favor the occurrence of oil and gas." (p. 15, 16). We suggest that a complete explanation be provided detailing how mineral potential information was gathered for the WSA. What criteria were used? Who participated? Was a survey conducted?



A DIVISION OF RMGMA
200 South Center Suite 115
Casper, Wyoming 82401

Mr. Bob Tigner
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September 20, 1981

FLPMA (see 901) provides that prior to any reclassification for the designation as wilderness, mineral values shall be determined. We do not believe that this has been adequately accomplished. To make a recommendation as to this area would be premature and would not allow for complete consideration of minerals in the final decision.

Thank you for the opportunity to comment. We hope these issues will be taken into consideration.

Sincerely,
Wanda J. Sweeney
Wanda J. Sweeney

field mineral survey conducted by BLM during the summer of 1978 and 1979. The EIS represents a summary of this information. Complete details on the mineral information so far collected are available in the referenced documents.

6. The final mineral survey of the Ferris Mountains WSA will be conducted by the U.S. Bureau of Mines and Geological Survey.

TEXAS GAS EXPLORATION CORPORATION
410 SEVENTH STREET, SUITE 140
DENVER, COLORADO 80202
PHONE: 303-521-1344



September 24, 1981

Mr. Draft Environmental Impact
Statement
Ferris Mountains
Wilderness Study Area
Carbon County, Wyoming

Bureau of Land Management
Rawlins District Office
P.O. Box 470
Rawlins, Wyoming
Attention: Mr. Dave Miller
District Manager

Gentlemen:

Texas Gas Exploration Corporation appreciates the opportunity to provide comments with regard to the Draft Environmental Impact Statement for the Ferris Mountains Wilderness Study Area.

Texas Gas is the owner of federal oil and gas leases totaling approximately 11,000 acres within and contiguous to the proposed WSA. Inclusion of the Ferris Mountains Wilderness Study Area in the national wilderness would eliminate approximately 1000 acres of Texas Gas leasehold, and would critically affect the ability of Texas Gas to evaluate the oil and gas potential of another contiguous 11,000 acres. We feel the impact on our contiguous acreage must be considered in any decision regarding the Ferris Mountains Wilderness Study Area.

Although oil and gas production has not been established beneath thrust Precambrian rocks in the Sweetwater Arch area, the proposed Ferris Mountains Wilderness and the acreage to the northeast clearly have potential for production. Table 1 shows the proximity of significant oil and gas production to the Ferris Mountains Wilderness Study Area. About 20 miles west of the Ferris Mountains Wilderness Study Area, Amoco is currently drilling a "Mountain Front" well through thrust Precambrian and was at 10,000' running a drillstem test in the Permian Phosphoria. About 11 miles away, Sinclair drilled a 12,000' well

Bureau of Land Management
Rawlins District Office
September 24, 1981
Page 2

which penetrated over 10,000 feet of sediments beneath thrust Precambrian.

Oil and gas exploration for "Mountain Front" objectives is currently active in the Rockies, with at least eight wells drilling or about to be completed at the present time (Table 2). Geophysical surveys and leasing are currently underway on all Mountain Fronts. Oil production beneath Mountain Fronts has been established on the north flank of the Laramie Range, at Glenrock Field (INDEX map, 40-T1N-87W). Significant Precambrian gas production has been established beneath thrust Precambrian on the west flank of the Teton Arch, at Teton Plate Field (see 14-T1N-87W, National County, Wyoming). Moncrief has drilled several low-permeability wells in this field.

No deep wells have been drilled on the Texas Gas leasehold in the Ferris Mountains area, as the existence of potentially productive sediments beneath thrust Precambrian rocks must be inferred from geophysical methods such as reflection seismic data, magnetotelluric data, and gravity data. Champion Petroleum Company has performed extensive magnetotelluric surveys ("MT") along the Sweetwater Arch and has concluded that up to 15,000' of Mesozoic or younger rocks are present beneath thrust Precambrian rocks under Texas Gas leasehold within and contiguous to the Ferris Mountains Wilderness Study Area. MT is a relatively inexpensive geophysical reconnaissance tool which lacks the precision to define geological structures as is possible with more costly reflection seismic data. Whereas MT data can be obtained from individual recording stations, seismic data is structurally complex areas must be obtained along extensive, relatively straight lines which must rise into existing well control in the adjacent basin. Only then can interpreters have confidence that the observed reflections are produced by potentially productive sedimentary rocks, since reflections can be produced by a variety of different sources. A high degree of confidence results only when known reflectors can be followed continuously from basin well control into structurally complex uplifts. For best results, the seismic lines must be relatively straight, otherwise false events may be recorded which are indistinguishable from real events produced by geologic structures.

It is for these reasons that wilderness designation of the Ferris Mountains Wilderness Study Area would critically affect the ability of Texas Gas or its partners to obtain high quality seismic data over the contiguous 11,000 acres of leasehold. To be definitive, seismic lines should be well north of the Ferris Mountains and extend about 10 miles to the northeast. Attempting to obtain a "fringe" of data around the proposed wilderness would result in very poor quality data which would be of insufficient precision to define geological structures at depth. Therefore, Texas Gas or its partners would fail to obtain the necessary data required to evaluate the oil and gas potential of the contiguous leasehold.

Response to Letter No. 27

1. The BLM's Wilderness Management Policy allows for certain exploration activities in wilderness as long as wilderness values are preserved. Helicopter seismic studies could be done given adequate safeguards to the wilderness values. Therefore, designation of the WSA as wilderness should not constrain your ability to explore your leases adjacent to the WSA.

We strongly urge that wilderness exploration be permitted in the Ferris Mountain Wilderness Study Area. In other primitive areas, the Forest Service and the BLM have approved the use of geophysical, surface, and seismic methods, and have reported that seismic activity would cause minimal or no damage. Seismic activity is by its nature, and generally no shot holes need to be drilled. This activity would take place during a brief interval, several weeks, and would not affect the long-term opportunity for recreation or wildlife.

In closing, we are confident of the BLM's change to give "a thorough consideration of any identified or potential energy and mineral resource values" in making its recommendation for wilderness designation for the subject wilderness study area and therefore urge you to strongly reconsider your decision for this area. After careful review of the Draft Environmental Impact Statement for the Ferris Mountain Wilderness Study Area it is the position of Texas Gas that Alternative 1 - No Action, Existing Management, No wilderness, would provide the greatest opportunity for the BLM to realize its commitment of evaluating the Ferris Mountain Wilderness Study Area in light of its potential for "multiple resource and social and economic values and uses".

We gratefully acknowledge the invaluable role currently being played by the BLM in developing responsible planning methods for the critical decisions to be made with regard to the protection and development of the natural resources of our Country.

Very truly yours,

TEXAS GAS EXPLORATION CORPORATION

Dary G. Bell

Dary G. Bell
Exploration Manager

KD/Pfcip
Enclosure

TABLE 1

Field Name	Distance in miles from proposed Ferris Mts. Wilderness	Cumulative Production (to 12/82)
		Oil (bbl) Gas (Mcf)
Lost Soldier	8	175,179,628 30,478,040
Warty	8	81,883,086 24,645,477
Bunker Hill	5	— 4,774,083
Bailey Dome	8	1,449,521 5,776
Hannover	5	4,850,602 23,613
Ferris	3	281,690 —

TABLE 2
MOUNTAIN FOUNTAIN WELLS
CENTER (as of 8/15/83)

Name	Location	Min. Depth	SS/SL
1-11 Boulder Dome DIT USA	NE 1/4 1-20-20-20	September 1980	Drill # 1011
1-12 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1012
1-13 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1013
1-14 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1014
1-15 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1015
1-16 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1016
1-17 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1017
1-18 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1018
1-19 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1019
1-20 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1020
1-21 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1021
1-22 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1022
1-23 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1023
1-24 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1024
1-25 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1025
1-26 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1026
1-27 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1027
1-28 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1028
1-29 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1029
1-30 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1030
1-31 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1031
1-32 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1032
1-33 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1033
1-34 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1034
1-35 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1035
1-36 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1036
1-37 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1037
1-38 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1038
1-39 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1039
1-40 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1040
1-41 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1041
1-42 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1042
1-43 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1043
1-44 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1044
1-45 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1045
1-46 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1046
1-47 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1047
1-48 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1048
1-49 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1049
1-50 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1050
1-51 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1051
1-52 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1052
1-53 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1053
1-54 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1054
1-55 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1055
1-56 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1056
1-57 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1057
1-58 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1058
1-59 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1059
1-60 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1060
1-61 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1061
1-62 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1062
1-63 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1063
1-64 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1064
1-65 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1065
1-66 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1066
1-67 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1067
1-68 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1068
1-69 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1069
1-70 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1070
1-71 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1071
1-72 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1072
1-73 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1073
1-74 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1074
1-75 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1075
1-76 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1076
1-77 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1077
1-78 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1078
1-79 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1079
1-80 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1080
1-81 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1081
1-82 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1082
1-83 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1083
1-84 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1084
1-85 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1085
1-86 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1086
1-87 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1087
1-88 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1088
1-89 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1089
1-90 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1090
1-91 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1091
1-92 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1092
1-93 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1093
1-94 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1094
1-95 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1095
1-96 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1096
1-97 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1097
1-98 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1098
1-99 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1099
1-100 Brown Ancho- DIT USA	SW 1/4 1-20-20-20	September 1980	Drill # 1100

(This letter was retyped for better readability.)

Anthony M. Nigano Sr.
1822 Matthews Ct.
Hawthorne, NY 12201

Director Manager
Lawrence District

Dear Sir,

I would like to offer comment on the Ferris Mountain Study. I attended the meeting held at the Jeffery Center and later read the (DEIS).

In my opinion the Ferris Mountains should be managed as an enhanced wilderness area. I understand that this is listed as (Proposed # 1).

I feel that this is the only way that that this area can be protected from any future development. I noticed that an energy company was interested in possible development of oil leases. If these leases were allowed to be developed, the roads and sites if any, would forever change the unique character of these mountains.

These mountains contain herds of Elk and Deer that would be greatly disturbed by this sort of activity. It has been proven that in addition to the disruption, there is a great deal of poaching that goes along with the development. I think that alternative # 3 would preclude these things.

Sincerely yours,

/s/ A. M. Nigano Sr.

Response to Letter No. 28

1. Thank you for your comments.

Response to Letter No. 29

1. Thank you for your comments.

(Typed copy of a handwritten letter.)

2007 23.7

Please save Adobe Town because of the bad land formations small isolated
butter sand Dunes Canyons Mountains History the Pass and a land of sage grouse
cynotus jack rabbits Lizard Mule Deer. The bald eagle and the black foot.
Please save this place it is a real wonder. We must save Adobe Town. Please
turn it in to a Wilderness Park to save something Real and of the Pass. for
History and a place to get away to

1992, 1993, 1994, 1995, 1996, 1997, 1998, 1999, 2000, 2001, 2002, 2003, 2004, 2005, 2006, 2007, 2008, 2009, 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017, 2018, 2019, 2020, 2021, 2022, 2023, 2024, 2025, 2026, 2027, 2028, 2029, 2030, 2031, 2032, 2033, 2034, 2035, 2036, 2037, 2038, 2039, 2040, 2041, 2042, 2043, 2044, 2045, 2046, 2047, 2048, 2049, 2050, 2051, 2052, 2053, 2054, 2055, 2056, 2057, 2058, 2059, 2060, 2061, 2062, 2063, 2064, 2065, 2066, 2067, 2068, 2069, 2070, 2071, 2072, 2073, 2074, 2075, 2076, 2077, 2078, 2079, 2080, 2081, 2082, 2083, 2084, 2085, 2086, 2087, 2088, 2089, 2090, 2091, 2092, 2093, 2094, 2095, 2096, 2097, 2098, 2099, 2100, 2101, 2102, 2103, 2104, 2105, 2106, 2107, 2108, 2109, 2110, 2111, 2112, 2113, 2114, 2115, 2116, 2117, 2118, 2119, 2120, 2121, 2122, 2123, 2124, 2125, 2126, 2127, 2128, 2129, 2130, 2131, 2132, 2133, 2134, 2135, 2136, 2137, 2138, 2139, 2140, 2141, 2142, 2143, 2144, 2145, 2146, 2147, 2148, 2149, 2150, 2151, 2152, 2153, 2154, 2155, 2156, 2157, 2158, 2159, 2160, 2161, 2162, 2163, 2164, 2165, 2166, 2167, 2168, 2169, 2170, 2171, 2172, 2173, 2174, 2175, 2176, 2177, 2178, 2179, 2180, 2181, 2182, 2183, 2184, 2185, 2186, 2187, 2188, 2189, 2190, 2191, 2192, 2193, 2194, 2195, 2196, 2197, 2198, 2199, 2200, 2201, 2202, 2203, 2204, 2205, 2206, 2207, 2208, 2209, 2210, 2211, 2212, 2213, 2214, 2215, 2216, 2217, 2218, 2219, 2220, 2221, 2222, 2223, 2224, 2225, 2226, 2227, 2228, 2229, 2230, 2231, 2232, 2233, 2234, 2235, 2236, 2237, 2238, 2239, 2240, 2241, 2242, 2243, 2244, 2245, 2246, 2247, 2248, 2249, 2250, 2251, 2252, 2253, 2254, 2255, 2256, 2257, 2258, 2259, 2260, 2261, 2262, 2263, 2264, 2265, 2266, 2267, 2268, 2269, 2270, 2271, 2272, 2273, 2274, 2275, 2276, 2277, 2278, 2279, 2280, 2281, 2282, 2283, 2284, 2285, 2286, 2287, 2288, 2289, 2290, 2291, 2292, 2293, 2294, 2295, 2296, 2297, 2298, 2299, 2300, 2301, 2302, 2303, 2304, 2305, 2306, 2307, 2308, 2309, 2310, 2311, 2312, 2313, 2314, 2315, 2316, 2317, 2318, 2319, 2320, 2321, 2322, 2323, 2324, 2325, 2326, 2327, 2328, 2329, 2330, 2331, 2332, 2333, 2334, 2335, 2336, 2337, 2338, 2339, 2340, 2341, 2342, 2343, 2344, 2345, 2346, 2347, 2348, 2349, 2350, 2351, 2352, 2353, 2354, 2355, 2356, 2357, 2358, 2359, 2360, 2361, 2362, 2363, 2364, 2365, 2366, 2367, 2368, 2369, 2370, 2371, 2372, 2373, 2374, 2375, 2376, 2377, 2378, 2379, 2380, 2381, 2382, 2383, 2384, 2385, 2386, 2387, 2388, 2389, 2390, 2391, 2392, 2393, 2394, 2395, 2396, 2397, 2398, 2399, 2400, 2401, 2402, 2403, 2404, 2405, 2406, 2407, 2408, 2409, 2410, 2411, 2412, 2413, 2414, 2415, 2416, 2417, 2418, 2419, 2420, 2421, 2422, 2423, 2424, 2425, 2426, 2427, 2428, 2429, 2430, 2431, 2432, 2433, 2434, 2435, 2436, 2437, 2438, 2439, 2440, 2441, 2442, 2443, 2444, 2445, 2446, 2447, 2448, 2449, 2450, 2451, 2452, 2453, 2454, 2455, 2456, 2457, 2458, 2459, 2460, 2461, 2462, 2463, 2464, 2465, 2466, 2467, 2468, 2469, 2470, 2471, 2472, 2473, 2474, 2475, 2476, 2477, 2478, 2479, 2480, 2481, 2482, 2483, 2484, 2485, 2486, 2487, 2488, 2489, 2490, 2491, 2492, 2493, 2494, 2495, 2496, 2497, 2498, 2499, 2500, 2501, 2502, 2503, 2504, 2505, 2506, 2507, 2508, 2509, 2510, 2511, 2512, 2513, 2514, 2515, 2516, 2517, 2518, 2519, 2520, 2521, 2522, 2523, 2524, 2525, 2526, 2527, 2528, 2529, 2530, 2531, 2532, 2533, 2534, 2535, 2536, 2537, 2538, 2539, 2540, 2541, 2542, 2543, 2544, 2545, 2546, 2547, 2548, 2549, 2550, 2551, 2552, 2553, 2554, 2555, 2556, 2557, 2558, 2559, 2560, 2561, 2562, 2563, 2564, 2565, 2566, 2567, 2568, 2569, 2570, 2571, 2572, 2573, 2574, 2575, 2576, 2577, 2578, 2579, 2580, 2581, 2582, 2583, 2584, 2585, 2586, 2587, 2588, 2589, 2590, 2591, 2592, 2593, 2594, 2595, 2596, 2597, 2598, 2599, 2600, 2601, 2602, 2603, 2604, 2605, 2606, 2607, 2608, 2609, 2610, 2611, 2612, 2613, 2614, 2615, 2616, 2617, 2618, 2619, 2620, 2621, 2622, 2623, 2624, 2625, 2626, 2627, 2628, 2629, 2630, 2631, 2632, 2633, 2634, 2635, 2636, 2637, 2638, 2639, 2640, 2641, 2642, 2643, 2644, 2645, 2646, 2647, 2648, 2649, 2650, 2651, 2652, 2653, 2654, 2655, 2656, 2657, 2658, 2659, 2660, 2661, 2662, 2663, 2664, 2665, 2666, 2667, 2668, 2669, 2670, 2671, 2672, 2673, 26

We all so must save and turn the Ferris Mountains in to a Wilderness because
it is a wonder you will see Mountains Miles forest Deep Canyons plains, sand
Dunes and sizes Lakes and ponds near, and the Wild life in the Ferris
Mountains are elk antelope Wile Bear big Horn sheep Dear air please save this
place all so there is eagle fox badger beaver black bear and lynx near please
save this place

Source: *Author's calculations*.

please save the Red Desert. a land of miles canyons badlands plains huge sand dunes 175 feet high and 100 miles long. a wonder This place is a land of history and the Pass. Dear sir you will see elk antelope for coyotes mule deer bighorn mountain lion eagle bobcat golden eagle wild horse and much

/s/ Larry DiStasio
5915 W. 19th St.
Chicago, Ill
60618



Gary Raymond
Fannie Mountain Ranch
Landon Route
Avalon, Ky 4201
Nov. 8, 1981

To, Upper Hutt
Rangiora District Office
Division Of Land Management
Unit 570
Rangiora, 4pming 8281

Case No. 30/1999

Thank you for the opportunity to comment on the Adobe Town - Farris Mountains Wilderness Environmental Impact Statement Draft. Following are some general comments and some specific concerns regarding the Farris Mountains portion of the EIS.

The Forest Mountains Run is of major importance to me. I grew up in and near the area and am personally desiring my sole wage and living from this land and, (the land willing) I will live the remainder of my life here. Therefore, I possess a special feeling of closeness to the area, and hold in my heart, a strong commitment to the preservation of all its beauty and everything that makes up its diverse and complex ecosystem. As a matter I am aware that the area is being considered for wilderness designation.

The working industry has been active in the Franco-Soviet Union for over a century. "Now, during this time, a high quality of militancy has evolved. It is quite of the best of the workers that have lived in the war. Workers, on several occasions, to whom the law (and also others) also had to report to intervene as a business. This is true, but it is public or private law. The "militancy of militancy" in itself, because the point that the management of the economy has been good. If it had not been, the militancy would not be there. This point is made, not just to show that the law, (militancy and militancy) are compatible, but that in this case, the war would not have been any more. It is "sympathetic relationship" if you will. Therefore, it is important that the working industry be guaranteed the present rights and level of life. This is wanted for the well-being of the

Responses to Letter No. 30

1. Our projections indicate that visitor use would not increase substantially; any increase would occur regardless of whether or not the WSA was designated wilderness. Only those resources that would be affected by either designation or nondesignation are analyzed in this EIS. Methods by which BLM could control visitor use, should it ever be warranted, would be addressed in a wilderness management plan if the area becomes designated wilderness, or in land-use plans if it is not designated.
2. Wilderness designation by itself would not affect either the kind or numbers of livestock in the WSA. Given that most management activities in the WSA are done without motorized vehicles, wilderness designation should not disrupt your day-to-day operations. In total, the WSA accounts for only 4% of the AUMs in all allotments comprising the WSA. Assuming in your example that grazing permits in wilderness areas have no explicit value to lending institutions, wilderness designation of the Ferris Mountains WSA would adversely affect the livestock industry's ability to borrow by only 4%. This is not considered to be a significant impact.

Dr. Anne Walton

November 5, 1981

Page 4

wilderness qualities. Now, it is important that the wilderness qualities be maintained for the well-being of the nation's industry.

I have given the proposed action and each of the alternatives a great deal of thought and consideration. As one who knows the area well and who is concerned about its future, I believe there are two major potential conflicts that (in the future) could have a profound and negative impact upon the area. These are: (1) increased visitor use and, (2) minerals, oil and gas exploration.

I would like to compliment the IIR on their analysis of the effects of mining and oil and gas exploration on this area. This was very well done.

However, I must express my displeasure with the way in which the violation was done was "steeped within the rug". The violation was done in possibly the most critical of all lanes facing the Fannie Mountains KM, and the unsightliness of this area. Many times in the past, (verbally as well as in writing) I have expressed my concern over potential increased violation use to the area. This issue was also apparent in the minds of other local, well-informed individuals who made these concerns known during the ongoing process.

I was very disappointed (to say the least), to find that the Census did not adequately address these claims. In fact, it was practically ignored in the QD. It seems you took the James "QD's" advice (in the ongoing process) and passed it off as a "non-jury solution". The Census's method of dealing with this issue is a most outstanding and visible omission of a concern identified through the ongoing process. However, I must compliment the QD on identification of the issues. This was very well done. On pages 13 and 14 of the QD under Legal Issues and Concerns, the variable issue cause was identified as a concern under Liability/Segregation, Recreational use and opportunities, Socioeconomic impacts, and Wildlife/Endangered values. It was a concern under Loss of the seven major cause categories in the QD. With the magnitude of concern over this issue, the QD should have given it a great deal more

The Visitor Use Issue was briefly mentioned and inadequately analyzed in the environmental consequences of the affected environments. It was not even

No. 1000-40/1000

November 8, 1981

2004

mentioned in the "visual resources" affected environment. Visual resources is one of the affected environments whose violation may result have a decided effect. I have seen litter and been seen in very unlikely and difficult-to-get places on the French Mountains. If litter does not have an effect on visual resources, I don't know what does. It is true, however, that this problem will occur with or without wilderness designation but it still needs to be analyzed.

in the Recreational Resources "Affected Environment" (p. 61), you devote one sentence to visitor use that states, "the volume of recreational use in the area would not increase appreciably....".

Under Socioeconomic "Affected Environment" (p. 74), under Agriculture, you state "the impacts imposed on agriculture would be negligible under the Proposed Action as any of the alternatives; therefore, no further discussion is necessary.....". There are just a few examples of how Vinton lies was not dealt with adequately. Vinton lies still increases and it still have an effect on the ranch operations in the area.

[illegible]

3. Boundary identification and trespass would be addressed in the wilderness management plan, should the WSA be designated as wilderness. BLM's Wilderness Management Policy specifically allows the continuation of livestock grazing and its associated facilities.
4. Essentially, the policy means that grazing will be allowed to continue in a designated wilderness to the same manner and degree as before designation. Designation would not affect obtaining a cooperative management agreement.
5. Legal access already exists to the WSA. Specific access needs would be addressed in a wilderness management plan.
6. Your recommendation is outside the scope of this EIS.
7. This discussion has been deleted from the final EIS.
8. This discussion has been deleted from the final EIS.
9. This section has been deleted from the final EIS.
10. This table has been deleted from the final EIS.
11. All BLM wilderness areas would be managed according to the guidelines in BLM's Wilderness Management Policy. This policy provides specific guidance for the management of various resource activities and provides valuable insight into the way BLM wilderness would be managed. Upon designation as wilderness, a formal Wilderness Management Plan would be written for each area. Before publishing such a plan, the public would be given the opportunity to review and comment on the contents.

1. Please see the new Proposed Action for the Adobe Town WSA.

July 14, 1981

District Manager
Bureau of Land Management
Klamath District Office
P.O. Box 670
Klamath, OR 97601

Dear Person:

which is common even designation of the Adobe from 451 as wilderness.

I have visited several portions of the USA and have experienced its solitude, its geologic features and its unique biological characteristics. The Adobe from USA does have wilderness character and should be so designated. Admittedly there are management conflicts in the USA. Some compromises are necessary to accommodate agriculture and development considerations. However the preferred "no wilderness" option is no consideration. As noted on page 30 of the DRT, the wilderness character of Adobe town will be irretrievably and irreversibly lost under the "no wilderness" alternative.

Because of this irretrievable loss, I urge that Alternative No. 2-Partial Wilderness be implemented for Adobe Town. The remainder of the WSA should be managed to protect its non-commodity resources and to ensure the wilderness character of the core. In particular, OHV use of the peripheral areas must be strictly and carefully controlled. If necessary, the lands surrounding the wilderness area should be considered for special management under designation as ACEC.

Sincerely,

Re:

Book: *Clustalgia*

1. Please see the new Proposed Action for the Adobe Town WSA.

2. This section has been deleted from the final EIS.

[Typed copy of a handwritten letter.]

John Merrifield
1010 Grand Ave., #3
Laramie, WY. 82070
July 27, 1983

District Manager
Sawline District
Bureau of Land Management
Box 670
Sawline, WY. 82301

Dear District Manager

[illegible]

My primary purpose for writing is to comment on the discussion of public opinion which begins on pg. 45. The final SIS, if it still includes that section, should alert the reader to the questionable relevance of the result of the surveys cited to the issue of SIS wilderness, the shortcomings (poor constructed questions) of some surveys, and thus the potential of misleading

SWA property is owned by the American people; at least count over 200 million of them. Yet the surveys are limited to a handful of Wyoming or Wyoming-Idaho-Montana residents. To the surprise of no social scientists, it's an economic person living closest to proposed wilderness areas have relatively more to gain (in dollars) from development than preservation, and thus are more likely as a group to favor development. Profits from

development are much more heavily concentrated geographically and in time than are the benefits of preservation. Thus, even a representative sample of Wyoming residents is more likely to favor development than a survey conducted nationwide.

I am not familiar with all the surveys, but two of them, I have seen or heard reports from. I responded to Rep Cheney's survey and recall being angered by the biased way in which the questions were written. I wish I had kept a copy so I could be more specific in my criticism, but my impression of several of the questions was that they were like asking a man if he still loves his wife. Whether the man answers yes or no, he in effect admits having beaten his wife. Rep Cheney's attempt at a survey was clearly an effort to help him cash passage of the Wyoming Wilderness Act, an act which he strenuously supports.

A question used by the Heritage Foundation is a clear example of this. It asks respondents to attempt to force an answer supportive of their position. They asked: "Is there enough wilderness in Wyoming?" of a number of Wyoming residents, again with the "fact" that "the American people are concerned about the loss of wilderness from the land." Asking whether there is enough wilderness in Wyoming makes as much sense as asking whether there is enough oil, gas, coal, or timber in Wyoming. The question is loaded because it is not clear what the respondents are to be subject to the decisions of the American people, all of them, not just the 7.2 percent of them living in Wyoming. It has visited several of Wyoming's cities and wilderness areas and people have been asked to answer the question all over the country, even to Wyoming to enjoy their wilderness, and thereby answer the question. The question is loaded because it is not clear what the state should do. Conduct a nationwide survey (Slattery, Bowers, et al) and ask: "Is there enough wilderness in the USA?" and you'll get much different results than the above question.

Irrelevant, biased, and misleading opinion surveys should not be included in an important decision-making document. It's worse than nothing at all. Please note my comments fairly in the Final EIS.

Sincerely,

/a/John Merrifield

1. Please note that the Proposed Action has changed from the draft EIS.

2. This alternative was eliminated from analysis in the final EIS because it would be creating a defacto wilderness which is contrary to BLM policy.

August 19, 1989

District Manager
Rawlins District
Bureau of Land Management
P.O. Box 670
Rawlins, Wyoming 82501

Dear Sir,

I would like to have my comments on the Rawlins District's draft environmental statement for the Adobe Town and Ferris Mountains Wilderness Study Area incorporated into the official report.

First, I would like to commend the BLM for producing a readable, understandable, and short draft EIS. My comments that follow will first address Adobe Town and second the Ferris Mountains.

1. Adobe Town
Although I am not completely familiar with the area, your description of the issues and conflicts that currently exist seem to make the Bureau's proposed action: No Wilderness, Intensive Resource Management, sound logical. It seems reasonable to allow development of 1.0 to 1.1 tcf of known natural gas reserves, rather than lock it up. I agree with and support the Bureau's proposed action for no wilderness at Adobe Town.

2. Ferris Mountains.
I am very knowledgeable and familiar with the Ferris Mountains, having been born, raised, and having lived as a livestock rancher in the immediate vicinity. Because of this familiarity with the Ferris Mountains area, I disagree with the Bureau's proposed action Wilderness

Mountains developed or exploited in any way. We who live and work in the area are proud of the undeveloped primitive nature of the mountains and do not want the present status changed. We do not think that the Bureau has to go to the extreme of recommending wilderness designation.

It would seem that the analysis and recommendation of Alternative No. 3 Management of Primitive Values, No Wilderness, would accomplish all of the necessary protection for the Ferris Mountains, without all of the fanfare and extra costs that go with wilderness designations. A wilderness designation will attract people who would otherwise never dream of visiting the Ferris Mountains. I really do not believe that BLM will ever have the funding and personnel to properly manage a wilderness area and insure that increased visitation doesn't ruin the area and cause problems for private land owners in the area.

I therefore urge the Rawlins District to re-evaluate your position and to adopt Alternative No. 2: Management of Primitive Values, No Wilderness, as the Recommended Management for the Grand Staircase.

Thank you for this opportunity to comment on this important issue.

October 1, 1983

COMMENTS ON PERRIS MOUNTAIN WILDERNESS EIS STATEMENT DRAFT

To those of us who live in the area, the status quo seems ideal in dealing with Perris Mt. We like the fact that the area is not overbuilt with people. For the most part, those who go into the Mountain (some are experienced outdoor people, who understand the magnitude of the terrain) at this time it does not have a great deal of people use. Without additional advertising, publicizing, or facilities, we do not see this condition changing in the foreseeable future.

Minerals in paying quantities have not been found here. Due to the magnitude of the terrain, neither oil nor gas or timber development seems feasible. We feel the area is best left to the wildlife and that few to enter livestock make use of it. By the same token, we realize that a limited number of experienced hikers need to have access in order to harvest the wild game, particularly deer and elk. Again the nature of the terrain makes this difficult except for the experienced hiker or the one who is experienced in the area.

We wish to bring out beside the terrain being mapped. It is very fragile and delicate and must stand a lot of people use. Any disturbance of soil or rock causes excessive erosion. After the fire in 1961, the majority lost most of the top soil through erosion. It was washed down into the lower country. The area is gradually healing itself and we would not like to see any change in use that would add to the erosion problem.

We believe that it is a mess for the old owners. "If it's not broken, don't fix it" and "Sometimes it is better to just leaving things alone." In other words, we are reasonably happy with the status quo.

We are not taking this stand with any malicious economic motive in mind. As the old use of the area is growing better and we understand this would continue to be allowed under a wilderness designation. We know this alternative because we feel it is best for the ecology of the area.

Thank you for soliciting comments on this EIS and giving all interested parties an opportunity to express their views.

W. R. Pollock
Mr. W. Pollock

Virginia Pollock
Virginia Pollock

Response to Letter No. 34

1. Thank you for your comments.

(Typed copy of a handwritten letter.)

John A. HANCOCK
P.O. Box 822
Merivale, Calif. 94761

October 20, 1983

Wildlife Service, Bureau of Land Management
P. O. Box 820
Merivale, Wyoming 82901

Dear Sir:

Please accept my comments as follows, concerning:

- Adobe Town and Perris Mountain Wilderness Study Areas, BLM
WYOMING

I became acquainted with these areas many decades ago, and continue to the firm opinion that they each possess wilderness, as well as, several wild life, historic and cultural resources of national significance. Land areas that are an important aspect of the nation's natural resources areas that provide a vital, and an all American hope, a lasting refuge for man, and for all life, on this endangered planet. I urge that the following areas, with adequate, serious complete wilderness protection, be added to our National Wilderness Preservation System, at this time:

Adobe Town 143,000
Perris Mountain 25,000

Plus:

to acquire all landings on all Public Land to permanently ban all forms of surface and sub-surface development on all present, proposed and potential wilderness.

With no, because of any road (new road) or they are to be added as wilderness.

For when we have wilderness:

we have nothing:

Sincerely,

John A. Hancock

Response to Letter No. 35

1. Thank you for your comments.

47 Bedford Ave.
Lowell, MA 01834
October 12, 1983

Director, Manager, BLM
Box 870
Mail no. 97 92501

Dear Sir:

I am happy to hear that you have recommended the Perris Mountain area for inclusion into the Wilderness System.

I do not think it is in the spirit of the Wilderness Act to exclude de facto wilderness from official designation just because there might be some minerals underneath it. For this reason, as well as others, I ask that you recommend the Adobe Town area for inclusion. Oil and gas can perhaps still be extracted by silent drilling from the periphery.

Sincerely,
William
P.W. Williamson

(Typed copy of a handwritten letter.)

P.O. Box 1078
Lander, Wyo. 82520
October 4, 1983

Director, Manager, BLM
Wildlife Service

Dear Sir:

I am writing to express my views concerning the Adobe Town-Perris Mtn. Draft Wilderness EIS. I am not presently operating for any organization, but rather as an individual sitting far from a typewriter in a cold, wind-blown cabin in Glacier City, Wyoming.

Perris Mtn. By and large, I agree with your handling and review of the Perris Mtn. They are truly unique and outstanding and fully deserve wilderness protection. I strongly endorse the "Wilderness Enhancement" alternative. It is a good, workable concept. And, my additional advice that could be added to this "mountain island" would be:

As a side note, I think you handled the matter about "leaving wilderness open" quite well (pg. 48). There is much more documentation on the subject if you need more. But, you covered the basic point in good shape.

Adobe Town By and large, I almost totally disagree with your analysis and proposal for Adobe Town. Surely it is a complex case, but nevertheless the area should not simply be discarded.

In the 1982 U.S.C. Report, Adobe Town (then known as Upper Sand Creek) was identified as having several hundred thousand acres of wildlands-rudely, twenty years later it was still the largest (relative area in the BLM inventory, but drastically reduced to some 80,000 acres. This same pattern of loss has virtually erased wildlands from the bad desert to the north.

Your own document expresses the importance of Adobe Town's area:

-- pg. 22: "Here, which is the of Adobe Town's important attributes,

contributes greatly to the wilderness character of the area."

-- pg. 27: "The feature contributes to the degree of solitude that the area provides: size and topography."

The natural features of Adobe Town are truly exceptional. The isolated nature of the area further enhances the striking features found there—sharply dissected rim, a mass of badlands, steep, narrow canyons, sand mesas; all multi-colored. Your own document confirms this.

Response to Letter No. 36

1. Please see the new Proposed Action. Directional drilling would allow the exploration and development of a small "fringe" area around a designated wilderness area at an added expense. However, it is not possible to directionally drill and develop an area as large as the Adobe Town WSA.

Responses to Letter No. 37

1. Your suggested alternative is not within the scope of this EIS because the lands included in your proposal have not been designated wilderness study areas. The area you suggest may be considered in future land-use planning efforts under the authority provided in Section 202 of FLPMA and the regulations in 43 CFR 1601 and 1610.
2. Please see chapter 1 for a discussion of alternatives considered but dropped from further analysis. Larger partial wilderness alternatives were considered but none reduced conflicts nor added important wilderness attributes.
3. This discussion has been deleted from the final EIS.

I personally support wilderness designation for the entire West of House
Furthermore, I would like to see a "wilderness management" alternative
that would mean the boundary northwest from House and embrace the
approach. Land exchanges would facilitate "filling up" the ownership and
management of these lands.

Obviously the "partial wilderness" alternative does not offer much of a
compromise nor even a viable, and management. I appreciate the fact that
you feel obligated to give and give-up the House. However, it appears to me
that based on Map 1, and first-hand knowledge of the area, you could develop a
new "partial" wilderness alternative that would, in fact, protect more lands
in the central portion of House than, and would not require the same
activities. (See Map 1, House and House Map 1). This would require a
re-examination of your position on this area, and a determination to actively
protect these exchanges, and eventually "fill-up" lands.

Finally, I feel that you placed much emphasis on a number of surveys
conducted by "public" and "private" sources. However, the House, in fact, is
without any real foundation. Public activities in Wyoming are difficult to
assess at any point in time. However, if you consider the overwhelming
support for wilderness in the House area, and the almost 10-15 split of
opinion over House area, your survey looks very poor.

Some of the surveys cited seem to be considered valid. Also, the survey
conducted by the House area should be seen as particularly valid since the
Wyoming Heritage Society sponsored it. The Heritage Society's total
opposition to wilderness is well-known. And furthermore, if you bothered to
ask the 40 percent of respondents to the survey who said "no" what
would be the designated wilderness" to the House area, you get 14 in
favor of House wilderness.

Thanks for this opportunity to comment.

Sincerely,

W. Mark Smith

38

[Typed copy of a handwritten letter.]

August 19, '81
Great Western Company
P.O. Box 111, Park

Dear Sirs,

How nice to hear that the lands of the West River Range and are leaving
control for about three weeks in the House wilderness and across Yellowstone
N.P. I really have no comment on the draft EIS for the House area. I
assume that sending you to you for forwarding to the appropriate N.P. is
a. with you. I have finished on and on - probably to be people other than
to about 1 in 10 in favor of a wilderness area for the House area.

I tried to get together with House members three times while in Park but we
were not able to meet. I should have arrived at the particular time.
I expect to be back in Park before I head back west in October and will again
make an effort to talk with you if we will be interested in talking
with House members. I'll give you a call at the same time to see how the
House area project is going.

All the best,
W. Mark

Response to Letter No. 38

1. Thank you for your comments.

COMMENTS ON PERLA MOUNTAIN WILDERNESS STUDY AREA DRAFT ENVIRONMENTAL IMPACT STATEMENT

August 19, 1981

The following comments on the Perla Mountain Wilderness Environmental Impact
Statement draft are from a retired man who traveled the South West and the
range while hiking the Continental Divide in the Great Divide Basin in May
1981. Although I have seen every part of the range from the ground, I
am not sure enough of it during several days' walking and near it to be certain that
it is a fine and named addition to the small total area of wilderness
remaining in the contiguous 48 states.

I support the EIS draft proposed action -- Wilderness Management -- for the
Perla Mountain. Although I prefer Alternative 1 -- Enhanced Wilderness
Management through Acquisition of Additional Lands, as a practical matter,
the purchase of the land additional area to make the wilderness study area a
complete unit may be unrealistic in present. The possibility of an exchange
of some lands to that recently retired out by the National Park Service,
the Rockefeller family, a retired out money company and the Bureau of Land
Management should not be discounted, however. Such an exchange would avoid
the possible future anomaly of second home tract developments inhibiting
access to parts of the wilderness. I suggest that this alternative be
reconsidered and be made the Proposed Action.

The EIS draft referred to some samples of public opinion in Wyoming which
appeared to show a majority view that this state already has "enough"
wilderness. These samples undoubtedly include some hunters who erroneously
believe that wilderness status operates against their interests, "locking-up"
game animals in inoperative preserves. Whereas the rationale for the majority
opinion may be, the fact is that wilderness status would be against the
interests of no one except that person who will have nowhere if he cannot do
it sitting on the fence who judges a mountain's usefulness by the number of
project pits in it.

As to the fear of adjacent landowners and grazing permit holders that
wilderness management would lead to greatly increased recreational use, litter
and vandalism, I believe such fears are unfounded. The Perla Mountain do not
now and probably never will attract noticeably larger numbers of hikers,
climbers, viewers of landowners than they do now. For this is not a suspect
area in a class with the Bridger Wilderness or other large nationally known
backpacking, climbing and fishing Mecca. It is, however, a very attractive
area of good size that remains reasonably unaffected by past potentially
damaging human activities such as mineral prospecting, off-road
recreational vehicle use and cattle and sheep grazing.

If managed as wilderness this study area would offer opportunities to the
hiker and climber to observe wildlife and flora in an undisturbed state. It

would provide superior hunting to the real hunter who is not dependent on four
wheel drive vehicles to get in and out of the hunting area. More so, it
would enhance the most important function of wilderness: keeping selected
ecosystems isolated from large scale exploitive human impact in order to
observe the long range effects of natural forces as well as those. The
location of the Perla Mountain on the edge of the Great Divide Basin would
seem to me to make this an important area for such comparative studies. Some
people divide this coastline for wilderness and often view the "game point"
segment as a nearly speculative hunting point. Perhaps there are no unusual
plants, animals or microorganisms in the Perla Mountain that could be either
critical or even moderately important to human survival. The point is that it
hasn't been on the list of human interest in the Perla Mountain to
manage them as wilderness, or, as it might be put, as a natural, unmanaged
laboratory. Even the largest suggested study to provide some grazing on
the public's lands -- in the form of extremely low grazing fees not available
to livestock in other regions -- would not be adversely affected by the
area's management as wilderness.

I agree with the EIS draft observation (p. 43) that litter and vandalism
should be no greater problem if the proposed action were adopted than under
the present management regime. In over 30 years of hiking throughout the
northern Rockies I have never seen backpacker litter -- not the discarded
frozen dried food wrappers or other artifacts usually associated with hikers. I
have seen only human-made recreational facilities, such as half-million panama
group line, but even these seem to be decreasing and any sign of residue
can be easily cleaned by extensive map improvement.

No hiker who has crossed New Mexico and Colorado on foot before making a
long distance hike in Wyoming, the most gratifying difference is the
relative limited extent of roads and jeep trails in the mountains here. In
the Wind River Mountains it is only north of the Green River lakes that one
can drive of these roads in the north end of the Continental Divide, while in
Colorado the cult of the broad horse has caused roads to run to the top of
practically every mountain in the state. The opportunity to take action to
exclude all vehicles from the Perla Mountain Wilderness Study area should
not be lost. I would support the application of this decision to the use of
vehicles to meet rescue, transport animals (except live animals) and trail
work. The only reason for this continued conversion to grazing areas of the
public domain is the relative convenience of one among several classes of
lands. It should and with wilderness designation.

I do not know what the "goldfields" are that are referred to in line 1 (first
full sentence) on p. 44 of the EIS draft, but I assume they refer to the Big
Wilderness Management Policy. After stating that new facilities could be
constructed by grazing permit holders under certain conditions and that motor
vehicle access by this single class of wilderness user could continue under
wilderness management, the draft statement adds that Congress clearly intended
for livestock grazing to continue. I do not suppose continued livestock
grazing at levels consistent with the standards applied by the Wilderness Act
in the definition section ("...with the impact of man's work substantially

unreasonable", but the building of new facilities seems to me to be unreasonable in Section 4.12 of the Wilderness Act "...except as necessary to meet minimum requirements for the administration of the area for the purpose of this Act...there shall be no temporary road, no use of motor vehicles, motorized equipment or motorboats, no landing of aircraft...and no structure or installation within any such area..." Obviously Congress has indicated that it condones an exception in this case.

39

District Manager
Bamline District
Bureau of Land Management
Box 670
Bamline, VT 05301

SEP 15 1983
BAMLINE DISTRICT

Dear District Manager:

I am writing to comment on your proposal to not recommend the Adobe Town WMA for wilderness designation. I disagree with your recommendation wholeheartedly. I visit hunting every chance I get and have ranged and hiked all over the state. The Adobe Town area is one of unparalleled beauty and must be preserved as such. It is my understanding that wilderness designation does not eliminate the possibility of oil and gas exploration and drilling but merely restricts and controls such use while making management for wilderness the priority. I believe a wilderness designation for the area would be the best all around use for the parties concerned. I strongly urge you to recommend wilderness.

Sincerely,

Allen L. Hammer
4221 S. Rosemary St
St. Louis, MO 63109

Response to Letter No. 39

1. Thank you for your comments.

106

40

841 Dandrew Dr.
Bamline, VT 05316
September 13, 1983

District Manager
Bureau of Land Management
Box 670
Bamline, VT 05301

Dear District Manager:

Re: Wilderness designation of Adobe Town and Ferris Mountains Areas
The Bureau is urged to recommend wilderness designation for both Adobe Town and Ferris Mountains area.

It appears that a combination of wilderness management and directional drilling would protect the beauty and pristine characteristics of the Adobe Town area, which had been considered for National Park status.

Sincerely yours,

Joe L. Himmelreich

Joe L. Himmelreich

Response to Letter No. 40

1. Thank you for your comments.

107

St. Mary Hall
2100 Lake Cove
Bamline, VT 05317

SEP 14 1983
BAMLINE DISTRICT

41

District Manager - Bamline District
Bureau of Land Management
Box 670
Bamline, VT 05301

Dear Sir:

Many of us realize, in the last, drive spiritual sustenance from either actual contact with, or just viewing of the natural world, and, in the process, we gain a sense of peace and tranquility. We must not forget that the preservation of natural systems is applicable to the very definition of wilderness areas such as the Bitter Lake, the Ferris Mountains, or the Ferris Mountains. We must not forget that the preservation of natural systems is applicable to the very definition of wilderness areas such as the Bitter Lake, the Ferris Mountains, or the Ferris Mountains.

The management of the land (management of resources) and the preservation of the land (management of resources) are two different things. The management of the land (management of resources) is the process of the preservation of the land (management of resources) and the preservation of the land (management of resources) is the process of the management of the land (management of resources).

That a pity that the wilderness management is not between the management of the land (management of resources) and the preservation of the land (management of resources) is the process of the management of the land (management of resources) and the preservation of the land (management of resources) is the process of the management of the land (management of resources).

I urge you to revise your position and the Adobe Town WMA for wilderness designation. Let us save this piece of wild beauty for future generations. Please send me a copy of your draft Environmental Impact Statement and Adobe Town.

For 1983
St. Mary Hall
2100 Lake Cove
Bamline, VT 05317

Response to Letter No. 41

1. Please see the new Proposed Action.

42 Sneaking About in the Wilds

There used to be one thing to report about sneaking about the way things have been in the past so much about his job. Whether staying out of the way of the Federal Forest, offering up wilderness areas and offering areas to strip miners and oil companies, or simply telling Congress and newsman exactly what was on his mind, Walt remained almost completely invisible behind the scenes that the nation's land ought to be used -- and that there was no use in his leaving it.

The attitude in the committee of America's public lands was always alarming, we depend on Walt's advice then, and we depend on him today too, for we are simply too far behind, holding to principles as strongly that it seemed that we are not even necessary, not Congress, not anyone else could do so.

We do not require a definite a month, and recently that is exactly what Walt has been to us. We had enough when in December he announced that he was returning from Federal protection 800,000 acres of Western land -- but waited until after Congress had adjourned for Christmas vacation before releasing the statement.

The secretive manner that he has followed since however, is the same. While acting as a friend of the wilderness, Walt, behind the nation's back, has kept right on backing away at the wilderness lands that in reality, without releasing a statement, ended in the Federal Register, with occasional

surveys based on again 1970, he has managed to almost like a secret. But the effects of the permit to permit removal are well worth noting. In the past so much about Walt has removed 120,000 more miles from wilderness protection, making a total of more than 1.5 million acres of Federal land removed since December. For multi-purpose use, including mining and development.

Walt and other Interior Department officials began to remove that more than 22 million acres of land from wilderness protection. The problem, it seems, is that Walt cannot wait that long. There is a danger that from 1987 Congress will have no choice left to make.

I, District Manager, 120 W. 1st Street, Suite 100, Seattle, WA 98101

Dear Mr. [Name],

I am shocked and surprised to learn that you have recommended that I should not take the time to visit the beauty, it is rich in forests and wild horses and antelope and other life, all of which are more valuable in the last analysis than any wildlife can and all these.

I write to you now to preserve your recommendation. Certainly it is that we need more wilderness protection in our land -- to help us maintain the human spirit, and in the end, and particularly in the future, are the "wilderness" areas in the "wilderness" to have and to have for all our people.

I have sent you a copy of your draft letter for both both John and David's attention.

Concerned citizen,
[Signature]

WILSON L. ALLEN
120 W. 1st Street, Suite 100
Long Beach, CA 90801

Response to Letter No. 42

1. Please see the new Proposed Action.

43

[Typed copy of a handwritten letter.]

Dear District Manager,

I am writing to urge the B.L.M. to recommend wilderness designation for Adobe Town and the Perito Mountains.

Your decision that Adobe Town is unsuitable for wilderness is unbelievable because this area is one of the wildest and most remote landscapes in Wyoming.

There should be a combination of wilderness management and directional drilling. This would allow protection of this outstanding area while still allowing all gas development.

Sincerely,

WILSON L. ALLEN
1211 White Drive
New Orleans, LA 70118

Response to Letter No. 43

1. Please see the new Proposed Action.

44

[Typed copy of a handwritten letter.]

WILSON L. ALLEN
89 Lusk Hill Road
Albany, N.Y. 12205
September 21, 1987

District Manager
RANCHO DISTRICT
Bureau of Land Management
Box 670, Boise, ID 83720

I urge that you designate both Adobe Town and the Perito Mountains as wilderness as a careful study clearly identified them as eminently qualified.

Very truly yours,

WILSON L. ALLEN

Response to Letter No. 44

1. Thank you for your comments.

42 Sneaking About in the Wilds

There used to be one thing to report about sneaking about the way things have been in the past so much about his job. Whether staying out of the way of the Federal Forest, offering up wilderness areas and offering areas to strip miners and oil companies, or simply telling Congress and newsman exactly what was on his mind, Walt remained almost completely invisible behind the scenes that the nation's land ought to be used -- and that there was no use in his leaving it.

The attitude in the committee of America's public lands was always alarming, we depend on Walt's advice then, and we depend on him today too, for we are simply too far behind, holding to principles as strongly that it seemed that we are not even necessary, not Congress, not anyone else could do so.

We do not require a definite a month, and recently that is exactly what Walt has been to us. We had enough when in December he announced that he was returning from Federal protection 800,000 acres of Western land -- but waited until after Congress had adjourned for Christmas vacation before releasing the statement.

The secretive manner that he has followed since however, is the same. While acting as a friend of the wilderness, Walt, behind the nation's back, has kept right on backing away at the wilderness lands that in reality, without releasing a statement, ended in the Federal Register, with occasional

surveys based on again 1970, he has managed to almost like a secret. But the effects of the permit to permit removal are well worth noting. In the past so much about Walt has removed 120,000 more miles from wilderness protection, making a total of more than 1.5 million acres of Federal land removed since December. For multi-purpose use, including mining and development.

Walt and other Interior Department officials began to remove that more than 22 million acres of land from wilderness protection. The problem, it seems, is that Walt cannot wait that long. There is a danger that from 1987 Congress will have no choice left to make.

I, District Manager, 120 W. 1st Street, Suite 100, Seattle, WA 98101

Dear Mr. [Name],

I have your letter for Adobe Town/Perito Mts and I see you have some careful job, but your recommendation of non-wilderness status is a betrayal.

Immigrants have ravished a continent. Those who would continue that ravishment for personal gain (the Alibates dollar) are at it still, and you have listened to their voice, while we who would preserve that little that is left evidently don't have a say.

But I want to see your alternative for both areas. That is, wilderness status, and with additional lands -- to secure the little that is left.

I look to you.

Concerned citizen,
[Signature]

[Typed copy of a handwritten letter.]

2000 S. Main St.
Casper, WY 82401
September 17, 1993

BLM Newlin District Office
1300 5th Street
Newlin, WY 82301

Gentlemen:

I am writing in regard to the Draft EIS for the Adobe Town/Perris Mountain wilderness study areas. I have visited and camped in the Perris Mountains, and I strongly support wilderness designation for this entire area. The Perris Mountains are very special, and I feel they would benefit from wilderness designation. I would like to see their unique geological formations, their wildlife, and their wildlife protected.

I think that Adobe Town also deserves wilderness designation. This area is a wonderful example of badlands, and is habitat for many desert wildlife species as well as wild horses. If development is allowed in this area, especially repeated land, it will take many many years to return to its natural state. I think it's important to have Adobe Town as wilderness area as an undisturbed example of badlands. They are really spectacular.

Please designate both the Perris Mountains and the Adobe Town as wilderness areas.

Sincerely,
/s/Martin Olson

Response to Letter No. 45

1. Thank you for your comments.

[This letter was retyped for better readability.]

2921 NE 5th Street
Lighthouse Point, Florida 33064
September 16, 1993

District Manager
Bureau of Land Management
Box 479
Newlin, WY 82301

Dear District Manager:

I urge the designation as wilderness of Adobe Town (81,871 acres) and Perris Mountain (20,495 acres) wilderness study areas. Adobe Town is particularly spectacular with its highly eroded rim, fenestria, wild horses, and antelope. Perris Mountain has deep canyons, rim, and a part of the Continental Divide Trail. I hope these two areas can be included in the Wilderness System.

Sincerely,
/s/Ronald Secord

Response to Letter No. 46

1. Thank you for your comments.

[Typed copy of a handwritten letter.]

Sept. 25, 1993

Dear Sirs,

I applaud the decision to recommend the Perris Mountain wilderness study area (WSA) in Wyoming for wilderness designation. The WSA has rugged terrain with deep canyons and steep slopes. The area also contains very good ash habitat, unique limestone formations, and a portion of the Continental Divide Trail. This area should be designated as wilderness.

When an area is studied for wilderness designation the land should be studied on its own wilderness merits. The decision should not be based on a potential conflict with oil and gas development. This seems to be the case with Adobe Town. This area is one of the wildest and most remote landscapes in Wyoming. It also contains many highly eroded rim that are rich in fenestria, wild horses, and antelope.

With the constant loss of all our forests, wetlands, wilderness areas and parks due to commercial development it is time to halt this process before it is too late. The BLM gives the slightest possibility of mineral exploitation a higher priority than wilderness management. More concern is needed for our wilderness areas to survive so we can live in harmony with nature and we and our generations to come will have them to enjoy and benefit from. I am writing you to please reconsider the decision making Adobe Town unsuitable for wilderness designation. I believe that a combination of wilderness management and directional drilling would allow protection of this outstanding area while still allowing oil and gas development. Thank you for any help you can give in saving this area.

Sincerely yours,
/s/Ronald L. Hocking

Ronald Hocking
85-05 40 Ave.
Naperville, N.Y. 11778

Response to Letter No. 47

1. Please see the new Proposed Action for Adobe Town.

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APPENDIX

STANDARD PROTECTION REQUIREMENTS

1. SURFACE DISTURBANCE STIPULATION (used on all leases)

Surface disturbance will be prohibited in any of the following areas or conditions. Modifications to this limitation may be approved in writing by the Authorized Officer.

- a. Slopes in excess of 25 percent.
- b. Within important scenic areas (Class I and II Visual Resource Management areas).
- c. Within 500 feet of surface water and/or riparian areas.
- d. Within a quarter mile or visual horizon (whichever is closer) of significant sites along historic trails.
- e. Construction with frozen material or during periods when the soil material is saturated, frozen, or when watershed damage is likely to occur.

GUIDANCE

The SURFACE DISTURBANCE STIPULATION will be included in all BLM authorizations. The intent of this stipulation is to inform interested parties (potential lessees, permittees, operators) that, when one or more of the five (a through e) environmental conditions exist, surface disturbing activities will be prohibited unless or until the permittee or his designated representative and the surface management agency (SMA) arrive at an acceptable plan for mitigation of anticipated impacts. This negotiation will occur prior to development and become a condition for approval when authorizing the action.

Specific threshold criteria (e.g., 500 feet from water) have been established based upon the best information available. However, geographical areas and time periods of concern must be delineated at the field level (i.e., "surface water and/or riparian areas" may include both intermittent and ephemeral water sources or may be limited to perennial surface water). "Significant sites along historic trails," refer to those trail segments and sites which have been enrolled in or are eligible for enrollment in the National Register of Historic

Places. These decisions, where possible, should be described in the land use planning documents.

Modification or waiver of this stipulation must allow for additional requirements to be applied on a site specific basis, if necessary to mitigate the impacts of concern. Waiver of this stipulation must be based upon demonstration, through environmental analysis, plans of development, plans of operation, Application for Permit to Drill (APD) processing, etc., that the adverse effects will be mitigated or avoided.

2. WILDLIFE STIPULATION

a. To protect important big game ungulate winter habitat, drilling and other surface disturbing activity will not be allowed during the period from November 15 to April 30 within certain areas encompassed by this lease. The same criteria applies to elk calving areas from the period of May 1 to June 30. This limitation does not apply to maintenance and operation of producing wells. Modifications of this limitation in any year may be approved in writing by the Authorized Officer.

b. To protect important raptor and/or sage and sharp-tailed grouse nesting habitat, drilling and other surface disturbing activity will not be allowed during the period from February 1 to July 31 within certain areas encompassed by this lease. This limitation does not apply to maintenance and operation of producing wells. Modifications of this limitation in any year may be approved in writing by the Authorized Officer.

c. No surface occupancy will be allowed on that portion of the lease within the following defined area for the purpose of protecting wildlife habitat (e.g., **sage/sharp-tailed grouse strutting grounds**): (legal description). Modifications of this limitation in any year may be approved in writing by the Authorized Officer.

GUIDANCE

The WILDLIFE STIPULATION is intended to provide two basic types of protection, seasonal restriction (a and b) and no surface occupancy

APPENDIX

(c). A legal description will ultimately be required and should be measurable and legally definable. There are no minimum subdivision requirements at this time. The area delineated can and should be refined as necessary based upon current biological data at the time the APD or Sundry Notice is processed. It should eventually become a condition for approval in these permits.

The seasonal restriction section of the stipulation identifies three groups of species and delineates two similar timeframe restrictions. These two restrictions are big game ungulate and raptors/grouse. The big game ungulates including elk, moose, deer, antelope, and big horn sheep all require protection of crucial winter range between November 15 and April 30. Sage and sharp-tailed grouse and raptors such as eagles, accipiters, falcons, buteos, osprey, and burrowing owls, also require nesting protection during periods between February 1 and July 31.

The no surface occupancy section of the stipulation is intended for protection of unique wildlife and wildlife habitat values (e.g., sage grouse strutting grounds, known threatened and endangered species habitat, etc.) which cannot be protected using seasonal restrictions.

3. SPECIAL RESOURCE PROTECTION STIPULATION

In order to protect (resource value), the District Manager reserves the right to prohibit surface disturbance (i.e., within a specific distance of the resource value or between date-to-date) in (legal subdivision). This limitation does not apply to operation and maintenance of producing wells. Modifications to this limitation may be approved in writing by the Authorized Officer.

Resource Category:

- a. Recreation areas.
- b. Special historic features.
- c. Special management areas.
- d. Sections of major rivers.
- e. Prior existing rights-of-way.
- f. Occupied dwellings.

GUIDANCE

The SPECIAL RESOURCE PROTECTION STIPULATION is intended for use only in the few very specialized, site-specific situations where

one of the other three general stipulations will not adequately address the concern. The resource value, location, and specific restriction must be clearly identified. A detailed plan addressing mitigation and special restrictions on development will be required prior to development and will become a condition for approval in the Application for Permit to Drill or Sundry Notice.

4. NO SURFACE OCCUPANCY STIPULATION

No surface occupancy will be allowed on the following described lands (legal subdivision/area) because of (resource value). See examples.

Resource Category:

- a. Recreation and interpretive areas (campgrounds, historic trails, national monuments).
- b. Major reservoirs/dams.
- c. Special management areas (e.g., Area of Critical Environmental Concern, wild and scenic rivers).

GUIDANCE

The NO SURFACE OCCUPANCY STIPULATION (NSO) is intended for use only when other stipulations are determined insufficient to adequately protect the public interest and/or as an alternative to "no leasing." The legal subdivision and resource value of concern must be identified in the stipulation and be tied to a land use planning document. There will be no exceptions to this stipulation granted without amendment of the appropriate land use plan.

When considering the no lease option, a rigorous test must be met and fully documented in the record. This test must be based on the stringent standards of the Interior Board of Land Appeals. Since rejection of a lease offer is more severe than the most restrictive stipulation, the record must show that consideration was given to leasing subject to reasonable stipulations including a NSO stipulation. The record must also show that stipulations were determined to be insufficient to adequately protect the public interest. A no-lease decision should not be made solely because it appears that directional drilling would be unfeasible, especially where a NSO lease may be acceptable to a potential lessee. In such cases the opportunity to accept or refuse a NSO lease should be left to the potential lessee.

APPENDIX

Exception(s) by the District Manager to the NSO stipulation will be subject to the same test used to initially justify the imposition of this stipulation. If the NSO stipulation is justified but upon development less restrictive stipulations would

adequately protect the public interest, then an exception to the NSO stipulation could be granted. The record must show that because conditions and uses have changed, less restrictive stipulations will protect the public interest.

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GLOSSARY

ALLUVIUM. Unconsolidated material deposited relatively recently in geologic time by a stream or other body of running water.

.ANIMAL UNIT MONTH (AUM); the amount of forage consumed by a cow-calf pair in one month.

COLLUVIUM. Loose incoherent deposits at the foot of a slope or cliff, brought there primarily by gravity.

COMMERCIAL TIMBER. Forest land that is capable of yielding at least 20 cubic feet of wood per year of commercial coniferous tree species.

CULTURAL RESOURCES. Fragile and nonrenewable remains of human activity, occupation, or endeavor reflected in districts, sites, structures, buildings, objects, artifacts, ruins, works of art, architecture, and natural features that were of importance in human events. These resources consist of (1) physical remains; (2) areas where significant human events occurred, even though evidence of the event no longer remains; and (3) the environment immediately surrounding the actual resource. Cultural resources, including both prehistoric and historical remains, represent a part of the continuum of events from the earliest evidences of humans to the present day.

FLPMA. The Federal Land Policy and Management Act of 1976. FLPMA provides guidelines for the administration, management, protection, development, and enhancement of the public lands administered by the Bureau of Land Management.

LIVESTOCK GRAZING OPERATIONS. Operations under permit where the primary purpose is the grazing of livestock for the production of food and fiber. Includes pack and saddle stock used in conjunction with such operations.

MANAGEMENT FRAMEWORK PLAN (MFP). The Bureau's basic planning decision document prior to the adoption of a new planning process in 1979.

MMBF. The abbreviation used by foresters to indicate a volume of one million board feet.

MINERAL WITHDRAWAL. Removal of specific federal lands from availability for mineral development.

MULTIPLE USE. "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some lands for less than all of the resources; a combination of balanced and diverse resource uses that take into account the long term needs but not limited to recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific, and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output. (From Section 103, FLPMA.)

NATURALNESS. Refers to an area which "generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable." (From Section 2(c), Wilderness Act.)

OFF-ROAD VEHICLE. Any motorized tracked or wheeled vehicle designated for cross-country travel over any type of natural terrain. Exclusions (from Executive Order 11644, as amended by Executive Order 11989) are non-amphibious registered motorboats, any military, fire, emergency, or law enforcement vehicle while being used for emergency purposes, any vehicle whose use is expressly authorized by the authorizing officer or otherwise officially approved, vehicles in official use, and any combat support vehicle in times of national defense emergencies.

OUTSTANDING. (1) Standing out among others of its kind; conspicuous; prominent. (2) Superior to others of its kind; distinguished; excellent.

PALEONTOLOGICAL RESOURCES. Fossilized remains of prehistoric faunal and floral species.

POST-FLPMA LEASES. Leases issued after October 21, 1976, the date of passage of the Federal Land Policy and Management Act.

PRECOMMERCIAL THINNING. Thinning noncommercial stands of young trees so that the growth potential of an area is utilized by fewer trees, therefore, the remaining trees grow larger in a shorter period of time, eventually becoming commercial timber.

PRE-FLPMA LEASES. Leases issued before October 21, 1976, the date of the passage of FLPMA.

PRIMITIVE AND UNCONFINED RECREATION. Nonmotorized and nondeveloped types of outdoor recreational activities.

RIPARIAN. Of or relating to or living or located on the bank of a water course.

SHPO. State Historic Preservation Office.

SOLITUDE. (1) The state of being alone or remote from habitations; isolation. (2) A lonely, unfrequented, or secluded place.

VISITOR DAY. A measure of recreation use; one visitor in an area for 12 hours, 2 visitors for six hours, etc.

WILDERNESS. The definition contained in Section 2(c) of the Wilderness Act of 1964.

WILDERNESS STUDY AREA. A roadless area or island that has been inventoried and found to have wilderness characteristics as described in Section 603 of FLPMA and Section 2(c) of the Wilderness Act of 1964.

ZEOLITE. A large group of hydro-aluminosilicate minerals formed especially in beds of tuff. Sometimes valuable for chemical properties allowing them to be used in ion exchange and adsorption.

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